

## UPMC Health Plan

May 18, 2021

Ms. Tracie Gray
Commonwealth of Pennsylvania Insurance Department
Insurance Product Regulation \& Market Enforcement
Actuarial Review Division
Bureau of Life, Accident \& Health Insurance
1311 Strawberry Square
Harrisburg, PA 17120

Dear Ms. Gray,

UPMC Health Coverage, Inc. respectfully requests approval of a rate filing for Individual On and Off Exchange HMO products. The rates are proposed for effective dates of 1/1/2022 through $12 / 31 / 2022$.

Company Name/NAIC \#: UPMC Health Coverage, Inc./15451
Market: Individual
On or Off Exchange: On and Off
Effective Date of Coverage: 1/1/2022
Average Rate Change Requested: 3.76\% (\$356.18)
Range of Rate Change Requested: $0.72 \%$ to $9.36 \%$ ( $\$ 2.56$ to $\$ 33.34$ )
Products Offered: HMO
Rating Areas Where Plans are Offered: 1, 5 (no change from 2021)
Metal Levels Offered: Catastrophic, Bronze, Silver, Gold
Currently Enrolled Lives Affected by the Rate Change: 2954
Currently Enrolled Policyholders Affected by the Rate Change: 2211
Number of Plans Offered in 2022: 9 (no change from 2021)
Total additional annual revenue generated from the proposed rate change: $\$ 871,249$
Corresponding Contract Form \#: 660, 676
Binder ID\#: UPMC-PA22-125107506
HIOS Issuer ID \#: 62560
Submission Tracking \#: UPMC-132801380
If you have any questions or require additional information, please call me at 412-454-7849 or email me at lovelymt@upmc.edu.

Sincerely,


## Attachment I

## Rate Change Summary

## UPMC Health Coverage, Inc. - Individual Plans

Rate request filing ID UPMC-132801380 - 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 https://www.insurance.pa.gov/Consumers/Pages/ACA-Rate-Filings.aspx

## Overview

| Initial requested average rate change: | $3.76 \%^{1}$ |
| :--- | :--- |
| Revised requested average rate change: | $2.51 \%^{1}$ |
| Range of requested rate change: | $-0.50 \%$ to $8.04 \%$ |
| Effective date: | $1 / 1 / 2022$ |
| Mapped Members: | 2,954 |
| Available in: | Rating Areas 1,5 |

## Key information

## Jan. 2020-Dec. 2020 financial experience

| Premiums | $\$ 10,915$ |
| :--- | ---: |
| Claims | $\$ 162$ |
| Administrative expenses | $\$ 1,957$ |
| Taxes \& fees | $\$ 409$ |
| Company made (after taxes) | $\mathbf{\$ 8 , 3 8 7}$ |

How it plans to spend your premium This is how the insurance company plans to spend the premium it collects in 2022:

| Claims: | $90.30 \%$ |
| :--- | ---: |
| Administrative: | $9.63 \%$ |
| Taxes \& fees: | $0.07 \%$ |
| Profit: | $0.00 \%$ |

The company expects its annual medical costs to increase 6.30\%.

## Explanation of requested rate change

Increasing cost and utilization trends. Change in reinsurance program coinsurance amount to 64\%.

[^0]
## UPMC Health Plan

U.S. Steel Tower<br>600 Grant Street<br>Pittsburgh, PA 15219<br>T 412-454-7500<br>F 412-454-7520<br>www.upmchealthplan.com

September 17, 2021

Ms. Tracie Gray
Commonwealth of Pennsylvania Insurance Department
Insurance Product Regulation \& Market Enforcement
Actuarial Review Division
Bureau of Life, Accident \& Health Insurance
1311 Strawberry Square
Harrisburg, PA 17120

Dear Ms. Gray,

UPMC Health Coverage, Inc. respectfully requests approval of a rate filing for Individual
On and Off Exchange HMO products. The rates are proposed for effective dates of 1/1/2022 through 12/31/2022.

1) Per the request of PID, we have updated the reinsurance coinsurance amount to be $64 \%$ in the PAAM Exhibits, II.a. Reins Table - Exp tab cell E5.
2) Due to the change in the reinsurance coinsurance amount, we have updated the projected incurred exchange user fee amount in Table 5.
3) The retention values in Table 6 changed as a result of the change in reinsurance coinsurance and the change in exchange user fee.

Company Name/NAIC \#: UPMC Health Coverage, Inc./15451
Market: Individual
On or Off Exchange: On and Off
Effective Date of Coverage: $1 / 1 / 2022$
Average Rate Change Requested: $2.51 \%$ (\$356.18)
Range of Rate Change Requested: $-0.50 \%$ to $8.04 \%$ ( $-\$ 1.77$ to $\$ 28.64$ )
Products Offered: HMO
Rating Areas Where Plans are Offered: 1, 5 (no change from 2021)
Metal Levels Offered: Catastrophic, Bronze, Silver, Gold
Currently Enrolled Lives Affected by the Rate Change: 2954
Currently Enrolled Policyholders Affected by the Rate Change: 2211
Number of Plans Offered in 2022: 9 (no change from 2021)
Total additional annual revenue generated from the proposed rate change: $\$ 581,027$
Corresponding Contract Form \#: 660, 676
Binder ID\#: UPMC-PA22-125107506
HIOS Issuer ID \#: 62560
Submission Tracking \#: UPMC-132801380
If you have any questions or require additional information, please call me at 412-454-7849 or email me at lovelymt@upmc.edu.

Sincerely,


## PA Actuarial Memorandum

## Basic Information and Data

The purpose of this actuarial memorandum is to provide certain information related to a rate submission for the company identified below. The relevant index rate is developed in accordance with federal regulations, and plan specific premiums are generated using the allowable modifiers in accordance with the single risk pool rule.

## Company Information

The following section provides information related to the identification of the company that is submitting this rate filing. Much of this information is also displayed in Table 0 of the PA Actuarial Memorandum Exhibits.

Company Legal Name: UPMC Health Coverage, Inc.
NAIC \#: 15451
HIOS Issuer ID: 62560
Market: Individual
Exchange: On and Off Exchange
Products: HMO
Effective Date: 1/1/2022


Filing Information:
Rate Filing SERFF Tracking \#: UPMC-132801380
Form Filing SERFF Tracking \#: UPMC-132820850, UPMC-132820832
Binder SERFF Tracking \#: UPMC-PA22-125107506

## Rate History and Proposed Variations in Rate Changes

Historical rate increases for the captioned company and market are presented in the table below.

| SERFF Tracking \# | Year | Rate Change |
| :--- | :---: | :---: |
| UPMC-131496004 | 2019 | $12.1 \%$ |
| UPMC-131943282 | 2020 | $2.2 \%$ |
| UPMC-132364646 | 2021 | N/A* |

*structure of Table 10 leads to DIV/0 error in cell AC15 for 2021 filing

## Average Rate Change

- Average rate change in Table 10, column AC of the PA Actuarial Memorandum Exhibits: $2.5 \%$
- Change in 21-year-old non-tobacco premium PMPM in Table 11, cell AN13 of the

PA Actuarial Memorandum Exhibits: 3.9\%

## Membership Count

Various breakdowns of the membership count for the captioned company and market are displayed in Table 1 of the PA Actuarial Memorandum Exhibits.

## Benefit Changes

A table with these changes has been included in Appendix I. All plans have metal level actuarial values in accordance with the latest HHS requirements.

## Single Risk Pool

The single risk pool consists of members that are anticipated to enroll in ACA-compliant policies offered under the captioned market.

## Experience Period Claims and Premium

Claims and premium data for all non-grandfathered policies in the single risk pool for the captioned company and market from the experience period (January 2020 - December 2020) with two months of run-out are displayed in Table 2 of the PA Actuarial Memorandum Exhibits. This section provides a discussion of each field in the table and its relation to the corresponding fields on the URRT. Please note that no data for transitional policies is included in this table.

## Earned Premium:

This represents the revenue accumulated by the captioned company during the experience period. No adjustments were made for MLR rebates as we do not anticipate owing them. HHS cost-sharing is not included in the premium data. Please note that the earned premium listed in Table 2 does match the total premium listed in section I, worksheet 1 of the URRT.

## Paid Claims:

This field includes uncompleted paid medical, pharmacy, and pediatric vision experience period claims for the captioned company and market.

## Ultimate Incurred Claims:

This field includes completed paid medical and pharmacy experience period claims for the captioned company and market. We used the standard Development/Completion Factor Method to calculate IBNR. The completion factors used in Table 4b are displayed in the table below. Factors were calculated using our entire ACA-related Individual block of business. The lower-than-expected factor for January 2020 can be attributed to a catasrophic claim that has not yet been paid. Because two months run-out is available the impact of IBNR is minimal. Please note that the ultimate incurred claims shown in Table 2 do not match the total incurred claims displayed in section I, worksheet 1 of the URRT because the value in the URRT equals the ultimate incurred claims less total prescription drug rebates listed in Table 2 and HHS cost-sharing.

| Month | Completion Factor |
| :---: | :---: |
| $1 / 1 / 2020$ | 0.9940 |
| $2 / 1 / 2020$ | 0.9999 |
| $3 / 1 / 2020$ | 0.9998 |
| $4 / 1 / 2020$ | 0.9996 |
| $5 / 1 / 2020$ | 0.9991 |
| $6 / 1 / 2020$ | 0.9979 |
| $7 / 1 / 2020$ | 0.9973 |
| $8 / 1 / 2020$ | 0.9879 |
| $9 / 1 / 2020$ | 0.9927 |
| $10 / 1 / 2020$ | 0.9882 |
| $11 / 1 / 2020$ | 0.9775 |
| $12 / 1 / 2020$ | 0.9486 |

## Member Months:

The sum of the experience period member months shown in Table 1 is also displayed in Table 2.

## Estimated Cost Sharing:

This field represents the difference between allowed claims and ultimate incurred claims in Table 2.

## Allowed Claims:

This field includes allowed medical and pharmacy claims as well as pediatric vision claims from the experience period for the captioned company and market, which are pulled directly from our data warehouse. Please note that the allowed claims shown in Table 2 do not match the total allowed claims displayed in section I, worksheet 1 of the URRT because the value in the URRT equals the allowed claims less total prescription drug rebates listed in Table 2.

## Non-EHB portion of Allowed Claims:

No non-EHB claims were reported during the experience period.

Total Prescription Drug Rebates:
This field shows the amount of prescription drug rebates received for the captioned company and market during the experience period. Pharmacy rebates have been removed from the total incurred and allowed claims displayed in section I, worksheet 1 of the URRT.

## Total EHB Capitation:

Pediatric dental benefits were paid for via capitation during the experience period. Pediatric dental claims were administered and paid by Dominion Dental. We receive a separate report from Dominion with the claim detail. Please note that pediatric dental claims will be administered and paid by UPMC beginning with the 2022 plan year and will no longer be paid for via capitation.

## Total Non-EHB Capitation:

Non-EHB benefits were not paid for via capitation during the experience period.

## Estimated Risk Adjustment:

Experience period Risk Adjustment was estimated to be a payment of $\$ 7,691$ per the Summary Report on Permanent Risk Adjustment Transfers for the 2020 Benefit Year published by CMS on June 30, 2021, which translates to a PMPM of \$213.63.

## Estimated Reinsurance Recoveries:

No private reinsurance recoveries were made during the experience period.

## Loss Ratio:

The loss ratio calculated in Table 2 is 5.03\%

## Credibility of Data

The very limited experience period enrollment of 36 member months requires $0 \%$ credibility to be used for the experience period data, as was implemented in prior filings by this company. The rate manual was developed using equivalent experience period data for UPMC Health Options, Inc. Individual single risk pool product, which is displayed in tables $2 b, 3 b$, and $4 b$ in the PA Actuarial Memorandum Exhibits. This data represents the same risk pool as UPMC Health Coverage, Inc. and has a large member month count of over 1,440,422. Therefore, it has been deemed credible to use. Adjustments made to the manual rate are discussed in the "Index Rate" section below.

## Trend Identification

The overall annual trend used in rate development is $6.30 \%$. Historical allowed claims for our Individual block of ACA-compliant business were used to develop year-over-year trend factors for use in the projected rates. The large enrollment count and consistent makeup of this population make it appropriate for use in trend development for this filing. Service categories were defined to be consistent with the URRT instructions. Please see Tables 3 and 3b of the PA Actuarial Memorandum Exhibits for trend development calculations. Please note that the minor changes made to benefit designs in order to keep plan actuarial values within the allowed ranges were not significant enough to warrant an adjustment for induced demand with regard to trend, so the induced demand column has been populated with zeroes in Tables 3 and 3b. Changes in provider contracting were considered but were ultimately assumed to have negligible impact on trend. Please see Exhibit 5 of the Supporting Exhibits for trend development. Please note that data for calendar year 2020 in this exhibit was adjusted to remove the effects of COVID-19 using the methodology described in the paragraph below addressing the Change in Other adjustment.

## Historical Experience

Historical data from the four most recent calendar years for the captioned company and market with two months of run-out are provided in Table 4. Allowed claims were developed using the same manner described above for Table 2. The historical data listed in Table 4b belongs to ACA-related Individual business under the UPMC Health Options legal entity and was used in the development of manual trend.

## Rate Development \& Change

## Projected Index Rate, Market-Adjusted Index Rate, \& Total Allowed Claims

Table 5 of the PA Actuarial Memorandum Exhibits shows the development of the projected index rate, MarketAdjusted Index Rate, and projected total allowed claims. Detailed discussions on the development of each quantity are provided below.

## Index Rate:

For this filing, the Index Rate of the Experience Period is set equal to the manual rate due to the lack of credibility. The calculation of the manual rate is shown in Table 2b of the PA Actuarial Memorandum Exhibits. The Index Rate of the Projection Period is then calculated in Table 5 by first applying two years of $6.30 \%$ annual trend to the Index Rate of Experience Period.

For 2022, the Pennsylvania Insurance Department has mandated that an adjustment factor of 0.999 is applied to the index rate to reflect the morbidity impact of the state-based reinsurance program in the Individual market. It has also been mandated that the Individual Adjustment factor of 1.01 be applied to the index rate to reflect current uncertainty surrounding the market in 2022 due to the repeal of the Individual Mandate. An additional load of 0.990 has been applied within the overall morbidity adjustment. This load accounts for healthier members that will move into the single risk pool as a result of the expanded subsidization offered under the American Rescue Plan Act.

An adjustment factor of 1.285 has been applied to the index rate to account for changes in network between the experience and projection period populations. Coverage was only offered in Crawford and Clearfield counties beginning in 2021, which is not reflected in the experience data. This adjustment factor is used to bring the experience data in line with the characteristics of the provider network included in these counties in 2022. Please see Exhibit 6 of the Supporting Exhibits for the derivation of this factor.

An adjustment factor of 1.076 has been applied to the index rate in the Change for Other category. This adjustment removes the effects of COVID-19 from the experience period data, bringing the Index Rate of Projection Period in line with expected claims experience for 2022. This factor was derived by determining the ratio of the Index Rate of Experience Period including COVID-19 medical claims adjustments to the Index Rate of Experience Period calculated using the raw, unadjusted data. Please see Exhibit 8 of the Supporting Exhibits for the derivation of this factor. Claims values included in the calculation of the former of these index rates have been adjusted at the medical service category level (no adjustments were applied to pharmacy claims). These service-level adjustments were developed by using trended and seasonality-adjusted 2019 ACA medical claims experience as a baseline for expected 2020 claims experience excluding the effects of COVID-19 and comparing this projected experience to actual claims experience from 2020.

No other adjustments have been applied to the index rate. The average age for our experience period Individual risk pool was 45.5 with an average premium factor of 1.90 . This is identical to our 2021 experience so far with age 45.5 and premium factor 1.90. The lack of change in factors suggests that the insured population is stable, and no additional adjustment for demographics was deemed necessary. Please note that the Index Rate of Projection Period of $\$ 772.96$ shown in Table 5 matches the corresponding value shown in section II, worksheet 1 of the URRT.

## Market-Adjusted Index Rate:

The Projected Index Rate is adjusted by adding estimates for risk adjustment and marketplace fees (with impacts and costs spread across the whole risk pool) to obtain the Projected Market Adjusted Index Rate. Projection period Risk Adjustment PMPM has been estimated to be a payment of $\$ 19.09$, which is displayed in Table 5 and is based on the risk profile of the underlying manual population. The value entered in section II, worksheet 1 of the URRT was $\$ 24.52$ since the calculation of the Market Adjusted Index Rate is done on an allowed claims basis in the URRT. The updated PMPM was derived by taking the original paid PMPM divided by the Paid to Allowed Average Factor. The net amount after accounting for the fee is subtracted from the Index Rate of the Projection Period as part of the calculation of the Market Adjusted Index Rate. For the URRT and Table 5 of the PA Actuarial Memorandum Rate Exhibits, it was entered as a negative number because the calculation subtracts this value. The effect is an increase in premium as additional revenue will be required to cover the anticipated payment.

The member-weighted average of a 3.0\% Marketplace User Fee for Marketplace enrollees combined with 0\% for non-Marketplace enrollees calculates to $2.3 \%$. This load is developed based on fees from on-exchange policies, but is spread over all policies uniformly. This translates to a PMPM of $\$ 15.35$, which was entered as a positive value in Table 5 since the calculation adds this value. The effect for this adjustment is an increase in premium as additional revenue will be required to cover the anticipated payment. Since the URRT requires the exchange user fee to be listed on an "allowed" basis, the final value included in the URRT was calculated by first taking exchange user fee PMPM of $\$ 15.35$ divided by the paid-to-allowed ratio to derive the "allowed" exchange user fee PMPM. This value was then divided by the market adjusted index rate to arrive at the final value of $2.6 \%$.

The index rate was further adjusted by accounting for estimated recoveries from the state-based reinsurance program. Estimated recoveries applied in Table 5 and section II, worksheet 1 of the URRT were $\$ 36.08$ PMPM and $\$ 46.35$ PMPM, respectively. The value entered in the URRT is different since the calculation of the Market Adjusted Index Rate is done on an allowed claims basis in the URRT. The updated PMPM was derived by taking the original PMPM divided by the Paid to Allowed Average Factor. These values were entered as positive values in Table 5 and the URRT since the calculation subtracts these values. The effect for this adjustment is a decrease in premium as less revenue will be required due to the anticipated recovery.

The estimated recovery of \$36.08 PMPM was derived using data entered into tabs II.a and II.b of the PA Actuarial Memorandum exhibits. Data entered into tab II.a matches the manual experience period data described in the sections above. Tab II.b was populated by referencing the same source of experience captured in tab II.a, but the member-level incurred claims were trended forward two years to the projection period and adjusted to remove the effects of COVID-19 before allocating the data to each bin within the continuance table. Annual claims trends of $6.30 \%$ and a COVID-19 adjustment factor of 1.076 were applied to estimate the projected member-level claims used to populate tab II.b.

## Total Allowed Claims:

The Market-Adjusted Index Rate is further modified to develop the projected total allowed claims PMPM by adding the projected allowed non-EHB claims PMPM. Benefits that were offered outside EHB include routine foot care and acupuncture. The projected allowed claims for these benefits is $\$ 1.35$ PMPM.

## Retention Items

Retention items related to this filing are shown in Table 6 of the PA Actuarial Memorandum Exhibits. Detailed discussions on each item are provided below.

## Administrative Expenses:

Administrative costs of $9.6 \%$ of premium have been displayed in Table 6 and the URRT. This value has been derived from projected administrative costs for the projection period. These expenses are assumed to be uniform for all plan designs.


## Taxes and Fees:

Taxes and Fees will remain at approximately $0.1 \%$ in 2022. This load accounts for the projected Federal Income Tax in 2022. Please note that the Risk Adjustment Administration Fee of $\$ 0.25$ PMPM and the projected PCORI Fee of $\$ 0.22$ PMPM were included in the Taxes and Fees field in Table 6 and the URRT.

## Profit/Contingency:

The projected profit margin for this company has been decreased from $2 \%$ in 2021 to $0 \%$ in 2022. This value is listed in both Table 6 and the URRT. The same level of profit margin is expected for each plan included in this filing.

## Projected Loss Ratio

The projected period loss ratio, using the federally-prescribed MLR methodology without the credibility adjustment, is $82.2 \%$, as shown in Exhibit 1 of the Supporting Exhibits.

An exhibit displaying historical MLR information is provided in Exhibit 2 of the Supporting Exhibits. Loss ratios in the 'Actual' column have been calculated from data submitted in the most recent three-year MLR filing using the federally-prescribed MLR methodology without the credibility adjustment. Enrollment data in the 'Actual' column ties directly to the historical data included in Table 4 of the PA Actuarial Memorandum Exhibits. Loss ratios and enrollment data in the 'Pricing' columns are projected values taken from each calendar year's approved ACA rate filing.

As shown in Exhibit 2, many differences exist between the actual and pricing loss ratios due to the extremely low population that was covered under the captioned company during this timespan.

## Normalized Market-Adjusted Projected Allowed Total Claims

Normalization factors for 2021 and 2022 are provided in Table 7 of the PA Actuarial Memorandum Exhibits. 2021 factors have been taken from the prior annual rate filing of the captioned company and market. Detailed discussion on each of the 2022 factors are provided below.

## Average Age Factor:

The average age factor was calculated using our projected ACA-related Individual population with the prescribed HHS Age Factors for 2022. It was assumed this represents the age distribution of the entire single risk-pool. The number of members under each age bracket was multiplied by the corresponding HHS Age Factor. These were then summed and divided by the total number of members to obtain the average age factor. For UPMC's entire block of ACA-compliant Individual business, the average age factor is 1.900 and average age was 45.5 during the experience period. This preliminary age factor is then multiplied by an adjustment factor of 0.997 , which accounts for the regulation that prohibits charging for more than three children per family, resulting in a final age calibration factor of 1.895. Please see Exhibit 3 in the Supporting Exhibits for the calculation of this factor.

## Average Geographic Factor:

The calibration factor of 0.965 was calculated as the weighted average of the geographical factors using projected enrollment for the single risk pool, as shown in Exhibit 4 of the Supporting Exhibits. Please see the Geographic Factors section below for a discussion on the development of factors applied for each rating area.

## Average Tobacco Factor:

The average tobacco factor was calculated using projected membership, which is assumed to have the same split for tobacco status as current membership. The member-weighted average of a $2.5 \%$ load applied for enrollees who qualify as tobacco users combined with a $0 \%$ load for non-tobacco users yields an average tobacco factor of 1.002. The derivation of this factor is shown below.

| Tobacco Status | Feb 2021 Enrollment <br> Split | Tobacco Factor | Calibration Factor |
| :---: | :---: | :---: | :---: |
| Non-User | $92.7 \%$ | 1.000 | 0.927 |
| User | $7.3 \%$ | 1.025 | 0.075 |
| Total | $100.0 \%$ |  | 1.002 |

## Average Benefit Richness:

Benefit richness factors were calculated so that the average value is 1.0 when weighted with projected membership as demonstrated in Table 10 of the PA Actuarial Memorandum Exhibits.

## Average Network Factor:

The network factor applied for the lone network included in this filing is 1.0.

## Components of Rate Change

Data to support the calculation of the components of the rate change is presented in Tables 8 and 9 of the PA Actuarial Memorandum Exhibits. Values presented in the 2021 columns have been taken from this company's 2021 annual rate filing.

## Plan Rate Development

Table 10 of the PA Actuarial Memorandum Exhibits has been populated as described in federal and state guidance to develop 2022 Plan Adjusted Index Rates. The allowable modifiers that are used in rate development are described below.

## Plan Actuarial Value:

The AV for each plan was determined by the issuer's own pricing model based on experience from UPMC's fullyinsured commercial block of business. This model calculates an AV for a given plan by first trending 2019 allowed claims data forward three years to the projection period, calculating paid amounts for each benefit category based on the benefit design of a given plan and projected allowed claims data, and taking the ratio of the total projected paid claims to projected allowed claims. Since the same tool was used for all plans, this eliminates any impact from morbidity at the plan level, and differing rate increases by product type are purely based on differences in benefit design for all plans within a given product.

## Benefit Richness (induced demand)

Benefit richness factors were calculated using the formula (Plan AV)^2 - (Plan AV) +1.24 , where (Plan AV) is equal to the product of the Plan AV described above and the Non-Funding of CSR Adjustment described below on a plan-by-plan basis. This formula was prescribed by the Pennsylvania Insurance Department and has been developed to produce induced demand factors that mimic those determined by HHS. The initial factors calculated using this formula were then normalized against projected membership by plan.

## Benefits in addition to EHBs

Benefits that will be offered outside EHB include routine foot care and acupuncture. The projected allowed claims for these benefits is $\$ 1.35$ PMPM. The adjustment factor of 1.002 included in Table 10 has been derived by adding the aforementioned PMPM to the projected index rate for 2022 and dividing this total by the same index rate, causing the adjustment to be applied uniformly to all plans.

## Provider Network

Since only one network is included in this filing, no network adjustments were deemed necessary for 2022.

## Catastrophic Eligibility

No adjustments were made for catastrophic plans. Current enrollment is minimal and not credible.

## Non-Funding of CSR Adjustment

To account for the elimination of funding for cost-share reduction subsidies, the Pennsylvania Insurance Department has mandated the rates for all silver plans offered both on and off the Federal Marketplace be increased by a factor of 1.22 in Table 10 of the Actuarial Memorandum Rate Exhibits. Several off-exchange only silver plans have been included for 2022 to minimize disruption to non-subsidized members enrolled in silver plans.

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

Table 11 of the PA Actuarial Memorandum Exhibits has been populated as described in federal and state guidance. 2022 rates calculated in this tables were tested to ensure that they match those included in the PA Plan Design Summary and Rate Tables, Federal Rates Template, and the binder.

## Plan Factors

## Age and Tobacco Factors

As indicated in Table 12 of the PA Actuarial Memorandum Exhibits, the default federal standard age curve for 2022 is used in the development of the Consumer Adjusted Premium Rates. A tobacco load of $2.5 \%$ will be used for all 21-and-over age bands in the Individual market in 2022. This load has not changed from 2021.

## Geographic Factors

The geographic rating areas used within this filing are the same as those defined by the state. To better reflect the varying costs of delivery between each geographical region in which coverage is offered, rating area factors have been updated for 2022. The table below summarizes changes in these factors:

| Region | $\mathbf{2 0 2 1}$ | $\mathbf{2 0 2 2}$ |
| :---: | :---: | :---: |
| 1 | 0.95 | 0.97 |
| 5 | 0.95 | 0.97 |

## Network Factors

Since only one network is included in this filing, no network adjustments were deemed necessary for 2022.

## Service Area Composition

Table 13 of the PA Actuarial Memorandum Exhibits shows the areas in which plans will be offered in 2022.
Service area maps for 2021 and 2022 have been uploaded in the Supporting Documentation section in SERFF.

## Composite Rating

No composite rating is used with these plans.

## Warning Alerts

Several warning messages appear after clicking the validate button in the URRT. These messages highlight the fact that a terminated plan has entries of zero in the current enrollment and premium PMPM fields on worksheet 2 of the URRT. This particular plan was terminated prior to 2021 but has experience in 2020 and therefore must be included in the URRT.

## List of Supporting Exhibits

Supporting exhibits have been included with the rate filing to assist with the review process. Below is a list summarizing the contents of each exhibit.

- Exhibit 1: Derivation of Projection Period MLR
- Exhibit 2: Actual vs Pricing MLR \& Member Months
- Exhibit 3: Derivation of Age Calibration Factor
- Exhibit 4: Derivation of Geographical Calibration Factor
- Exhibit 5: Derivation of Annual Trend
- Exhibit 6: Derivation of Change in Network Factor
- Exhibit 7: Derivation of 3-child Cap Adjustment Factor
- Exhibit 8: Derivation of Change in Other Factor
- Exhibit 9: Derivation of Agent/Broker Fees and Commissions
- Exhibit 10: Enrollment Data from January - May 2021
- Exhibit 11: Historical Actual \& Projected Claims Data
- Exhibit 12: Historical \& Projected Financial Gains/Losses


## Actuarial Certification

I, , am a Member of the American Academy of Actuaries. I am currently a Manager in the Actuarial Services department for UPMC Health Plan. I certify that:

- 因ll factor, benefit and other changes from the prior approved filing have been disclosed in this actuarial memorandum.
(New plans cannot be considered modifications of existing plans under the uniform modification standards in 45 CFR 147.106.
- Whe information presented in the PA Actuarial Memorandum and PA Actuarial Memorandum Rate Exhibits is consistent with the information presented in the 2022 Rate Filing Justification.
- The projected Index Rate is:
a. In compliance with all applicable state and Federal statutes and regulations (45 CFR 156.80 and 147.102)
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
- The Index Rate and only the allowable modifiers as described in 45 CFR 156.80(d)(1) and 156.80(d)(2) were used to generate plan level rates.
- The geographic rating factors reflect only differences in the costs of delivery and do not include differences for population morbidity by geographic area.
- The AV Calculator was used to determine the AV Metal Values shown in Worksheet 2 of the Part I URRT for all plans except those specified in the certification.



## PA Rate Template Part I

Data Relevant to the Rate Filing

Table 1 . Number of Member

|  | Membermonts | Members | Membermonts |
| :---: | :---: | :---: | :---: |
|  | spereience eeriod |  |  |
| Average fe | ${ }_{36} 3$ | ${ }^{93}$ | ${ }^{993}$ |
| Toal | ${ }^{36}$ | $\frac{2959}{116}$ | ${ }_{\frac{3,542}{1,42}}$ |
| ${ }_{18}^{48,24}$ | ${ }^{12}$ | ${ }_{13}^{136}$ | ${ }_{1}^{1.596}$ |
| ${ }_{30.34}^{2529}$ | $\bigcirc$ | ${ }_{1}^{196}$ |  |
|  | 12 | ${ }_{1}^{173}$ |  |
| 5549 | 0 | ${ }^{225}$ | 223 |
|  | ${ }_{12}^{12}$ | ${ }_{5}^{385}$ | ${ }_{\text {l }}^{4,5050}$ |
| ${ }_{\text {cose }}^{50.63}$ | : | ${ }_{271}^{27}$ |  |


| Emene Prenium | Paiu Caims | Utimate nurured Claims | Member Monts | Stimated cors hation | Alowe C Caims (No.C.Copitaed) |  |  | Totat Ene capitaion | Total Non:HB G Copitition |  |  | Simated einasurace eecoveries |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |

Table 3. Trend Component


Table 4 . Historical Experience



| Earee Premium | Paid Claims | Ultimate Incured Claims | Member Months | ${ }_{\text {ctst Shaing }}$ | s(Non-Capitatea) | Non-EHB porition of Allowed | Total Prescripion Drus Rebates* | Total EkB Capitation | Total Non:EHB Capitation | Adjus | Estimated Reinsurance Reco |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| (e) |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |

## Table 3b. Manual Trend Components



## Table 4b. Historical Manual Experience

| Morth-Vear | Total Annual Premium | Incurred Claims | Completion fatars* | Ultimate Incured Claims | Members | Ultimate Inurred PMPM | Stimaded Anual Cost Sharing | Prescripitio Drug Reabest* | $\xrightarrow{\text { Prowed claims (Ne of }}$ Prestioio | Allowed PMPM |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1an-17 | s | 40,54,5,39,85 | 1.0000 s | $40,545,379.85$ | 139,589 | 290.46 |  | (2,715,006, .5 | 55,762,500,78 | ${ }^{399948}$ |
| $\underset{\substack{\text { Feb-17 } \\ \text { Mar-17 }}}{ }$ |  | ${ }_{48,098,547 \text {, } 59}^{4.089}$ | ${ }_{1}^{1.00000}$ s | ${ }_{\text {48, }}^{4}$ | ${ }_{1}^{1424,796}$ | ${ }_{3}^{2944.10}$ |  |  | ${ }_{5}^{55,226,304,88} \mathbf{6 2 , 3 5 , 2 1 8 . 0 6}$ | ${ }_{\substack{386.89 \\ 43.11}}$ |
| Apr-17 |  | 44,310,461.16 | $1.0000{ }^{\text {s }}$ | 44,30,0,461.16 | ${ }_{1}^{142,331}$ | ${ }^{311.32}$ |  | ${ }_{\text {L }}^{12,768,3,37.955}$ |  | ${ }^{397.16}$ |
| Jun-17 |  | 46,902,160,81 | 1.0000 s | 46,902,160,81 | ${ }_{18,685}$ | ${ }^{338,19}$ |  | ${ }^{12,2977,43,255}$ | 658,45,718.93 | ${ }_{42146}^{40,46}$ |
| ${ }^{\text {Jul-17 }}$ |  | ${ }_{4}^{4}, 8,84,9,90.94$ |  | 45,845,970.94 | ${ }_{137,198}$ |  |  | ${ }_{\text {l2,66,501.10 }}$ | 56,129,924,28 |  |
| ${ }_{\text {Aup }}^{\text {cop-17 }}$ |  |  | ${ }_{1}^{1.00000}{ }^{\text {¢ }}$ |  |  |  |  |  |  | ${ }_{4}^{460.43}$ |
| Oeter |  |  |  |  | ckene | $\xrightarrow{408.7}$ |  |  |  |  |
|  | 621,597,64,20 | ${ }^{50,531,603,53}$ | $1.0000{ }^{\text {s }}$ | 50,531.603.53 | 126,883 | ${ }_{\text {398, } 38}$ | 160,355,23 | ${ }^{12,467,096,35}$ | 55, 99,5420.04 | $\xrightarrow{400.70}$ |
|  |  | ${ }_{51,556,093,74}$ | 1.0000 s | 51,56,093,74 | 1455014 | ${ }^{355.52}$ |  | (13,806,617.50) | 64,0,79,822,94 |  |
|  |  |  | ${ }^{1.0000}{ }^{10000} 5$ | ${ }_{\substack{50,8999,9475 \\ 53,2466976}}$ |  | ${ }_{\substack{365.12 \\ 3788}}^{\substack{\text { 3, }}}$ |  |  | $60,728820.91$ <br> 63385691324 | ${ }_{\text {4250.30 }}^{4}$ |
| Apr-18 |  | 58,73,213,56 | 1.0000 s | $58,732,213,56$ | 139,124 | ${ }_{422.16}$ |  | [13,52, 205 50, 01 | 67, 6 67, 624.28 | ${ }_{488789}$ |
| $\mathrm{Map} 218_{\text {Man-18 }}$ |  | ¢5,538,1.2.45 | ${ }^{1.0000}{ }_{1}^{10000}$ s | ¢5,588.162.45 |  | ${ }_{\substack{411.16 \\ 3955}}$ |  | (13,699.58.00) |  | ${ }_{452213}^{47.19}$ |
| ${ }^{\text {Jut } 18.18}$ |  | $\xrightarrow{53,977,82208}$ | ${ }^{1.0000}{ }^{\text {s }}$ | $\xrightarrow{53,977,8208}$ | ${ }^{1348823} 5$ |  |  | ${ }^{(1,559,103,75)}$ | ${ }_{\substack{\text { che } \\ 61.393,8888.22}}$ |  |
| ${ }_{\text {cepor }}{ }_{\text {Lut }}$ |  | 54,0,4,7771.30 | ${ }_{1}^{1.00000}$ ¢ | 54,044,771.30 |  | ${ }_{40935}^{4095}$ |  |  |  | ${ }_{4}^{455.45}$ |
| Otat 18 | s | 61,832,077.56 | 1.0000 s | 61,832,027.56 | ${ }^{130,665}$ | ${ }^{473.21}$ |  | (3,429,956,25) | 68,77, 103,68 | ${ }^{522.366}$ |
| ${ }_{\substack{\text { Nob-18 } \\ \text { Dec.18 }}}^{\text {a }}$ | $842,388.887 .800$ s | ${ }_{5}^{5,4,444,81.11}$ | ${ }_{1}^{1.00000}{ }^{\text {s }}$ |  |  | ${ }_{465929}^{44506}$ |  |  |  |  |
| Jam-19 |  | $54,313,24.87$ | $1.0000{ }^{\text {s }}$ | $54,313,24187$ | 139,130 | ${ }^{30.38}$ |  | (4,354,769.000) | 67,891,77,57 | 487.97 |
| Feb-19 |  | ${ }_{51,925,145,70}$ | ${ }_{1}^{1.0000}$ s | 51,925, 44, 7, | ${ }^{137,532}$ | ${ }^{377.55}$ |  |  | ${ }^{62,102,475,66}$ |  |
| ${ }_{\text {Mar-19 }}^{\text {Ac. } 19}$ | s |  | ${ }^{1.00000}{ }_{1}$ |  | ${ }^{13,513}{ }^{13,4150}$ ¢ | ${ }_{\substack{414.06 \\ 4474}}$ |  |  | 66,172,26.15 |  |
| Mar-19 |  | 58,51, 387.24 | 1.0000 s | 58,531,38724 | 1323880 | 442.15 |  | (4, 43, 4, 494.00) | 67,190,645,43 | 50756 |
| (Jum-19, | S |  |  |  |  | ${ }_{4}^{414.42}$ |  |  | 61, 6.2099994 .59 |  |
| Avg 19 |  | ${ }_{\text {58,403,76, } 27}$ | ${ }^{1.00000 ~}{ }^{5}$ | ${ }_{5}^{58,403,716,27}$ | ${ }_{127,732}$ | ${ }^{457,24}$ |  | [1,998,011.60) | 65,164,170,34 | ${ }^{510.16}$ |
| Sep-1-1 |  | 63,065,571.68 | ${ }_{1}^{1.00000}$ s | 56,067,571.68 |  |  |  | (13,9,9,709.60) |  | ${ }_{5}^{4988.12}$ |
| $\underset{\text { Doc-19 }}{\text { Not }}$ | 498,285,50 |  | $\frac{1.0000}{1.000}$ s | 56,120.38,44 |  | ${ }_{\substack{455.18 \\ 49285}}^{4}$ | 1455604246 | (13,59,077.900) |  | 500.66 |
| 1an-20 | s | 50,925,057.06 | 0.9940 s | $51.230,344,28$ | 126,146 | 406.12 |  | (4,804,901.14] | 64,181,912,90 | 508.79 |
|  |  |  | ${ }^{0.90999} 5$ | ST, | 124,393 <br> 122854 | ${ }^{410.82} \times 148$ |  | ${ }^{(4,738,293,37)}$ |  |  |
| ${ }_{\text {Apr } 20}$ |  | ${ }^{42,010,016.65}$ | ${ }^{0.99965}$ | ${ }_{\text {42,024,93, }}^{450}$ | 122,243 <br> 1222385 <br> 1.5 | ${ }^{343,788}$ |  | $14.556,235,877$ | $43,922,873.81$ | ${ }^{359.31}$ |
| Jun-20 |  |  | ${ }_{0}^{0.99979}$ | ${ }_{56,313,566.64}$ | ${ }_{\text {L }}^{122,2856}$ | ${ }_{4667.78}^{36,78}$ |  |  |  | $\xrightarrow{411.66}$ |
| $\xrightarrow{\text { 1ut20 }}$ |  |  | ${ }^{0.99775}$ | 58,056,268.11 | 119,768 <br> 118955 |  |  |  | 63,688,120,39 | ${ }_{531.76}$ |
| Sep-20 |  | 56,89,9,61,72 | 0.9927 5 | 57,28,746.60 | 118,073 | ${ }_{485.20}$ |  | (4,497,400.57] | 62,235,03,20 | 527.77 |
| Oot20 |  | ${ }_{5}^{557.489,90.51}$ | ${ }_{\substack{0.98825 \\ 0.075 \\ 5}}$ |  |  | ${ }^{496.85}$ |  | [4,455,9877.08) | 63,112,535.51 | 539.37 |
| $\xrightarrow{\text { Nop-20 }}$ Dec20 | 779,278,097.40 $\frac{5}{\frac{5}{5}}$ | 54,999,116.500.01 | ${ }_{0}^{0.997565 \mathrm{~s}}$ |  | 111,54789 | ${ }_{\substack{485.49 \\ 521.88}}^{4 .}$ | s $\quad 125,104,697.44{ }^{\frac{s}{s}}$ |  |  | (tis.07 |

[^1]
## PA Rate Template Part II



|  | Actual feperiere | Menal 0 ata |  |
| :---: | :---: | :---: | :---: |
|  | 17.09 | - ${ }^{45528}$ |  |
|  | 5 ${ }^{1.300}{ }_{1931}$ | s ${ }^{1.130} 559.5$ |  |
| Sine e Bisp Poold disisment fators |  |  |  |
|  | 099 | 0.999 |  |
|  | ${ }_{\substack{1000 \\ 1000}}^{\text {a }}$ | cine | -.See nera Instutions |
| Clangei onemozabhics | 1000 | 1.000 | -Se unar Ins |
|  | ${ }^{1.000}$ | ${ }_{\text {1200 }}^{12.25}$ |  |
|  | lion | ${ }_{\substack{1000 \\ 1006}}^{\substack{\text { che }}}$ | Cen |
|  | ${ }_{0 \%}{ }^{1929}$ | $5 \quad{ }^{1008}{ }^{7226}$ |  |
|  |  | ¢ ${ }^{1008}{ }_{\text {m296 }}$ | - See |
|  |  |  |  |
|  | (tor |  |  |
| Naxetemede Adistene |  |  |  |
|  | , |  |  |
| Premed | ( 36.08 |  |  |
|  | ${ }_{70.86}$ | - Maretatajused In | x Bate |
| Prijeceed Alowed Non:EHBC Clams emm | S 13.3 |  |  |
|  | 5 60.15 |  |  |
|  | ${ }^{722}$ |  |  |

For Informational Purposes only - No input required.

|  |  |
| :---: | :---: |
|  | ${ }^{5}$ |

Table 5 A. Small Group Projected Index Rate with Quarterly 7 Trend

| Etfert |  | 1/12022 |  | 9/17202 |  | 71/2022 |  | 101/2022 | Iaxp |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | ${ }_{7296}$ | 5 | ${ }^{72,96}$ | 5 | ${ }_{7296}$ | 5 | 7296 | s $\quad 7296$ |
|  |  |  |  | ${ }^{0} 0000$ |  | ${ }^{6} 6$ |  | ${ }^{9}$ |  |
| Sen | 5 | ${ }_{\text {cosem }}$ |  |  |  |  |  | ${ }^{\text {coinc }}$ | $5 \quad 7296$ |


| Reterion lems Espeses | Perentage | Pmemamouns |
| :---: | :---: | :---: |
|  | , | ${ }_{\substack{\text { S }}}^{5812}$ |
| (eamen |  | ¢ |
|  | cose | Soic |
|  | 为 | (cos |
|  |  | (tam |
| Potuflconitemeny (iter tax) | 0000x | soos |
| Total Retention | 9,70x | 5659 |
|  | 66574 |  |


|  |  | , |  | 2 | oifteence | Perent chares |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |
|  |  | (1022] |  |  | $\underset{\substack{12,39 \\ \\ 0.29}}{ }$ | ${ }_{68}$ |
|  |  |  |  |  |  |  |
|  | ${ }_{5}^{5}$ |  |  | ${ }_{\substack{20212}}^{205}$ | $\underset{\substack{12.65 \\ 0.10}}{\substack{\text { a }}}$ | ${ }_{\substack{3 \\ 3 \\ 0.585}}$ |
|  | s | cex 22.8 |  | (10, 10.68 | cise |  |
|  | S |  |  |  | (10,6) |  |
|  |  |  |  | (10258) | ctice | 边 |
|  |  |  |  |  |  |  |
| (ex |  |  |  |  |  |  |
|  |  | ${ }^{1522}$ |  |  | 521 | 1580 |
|  |  |  |  | (93, 18 |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  | -0, |
|  |  |  |  | 35.3 | ${ }_{\text {cose }}^{(15123)}$ |  |
| Mge in isellameositems |  |  |  |  | s. | 0.0 |
|  |  |  |  | ${ }^{36281}$ s |  |  |


| .allowd | 204 | 202 |  |
| :---: | :---: | :---: | :---: |
|  |  |  |  |
| URRT Trend (Total Applied Trend Factor) URRT Morbidity |  |  |  |
|  |  |  |  |
|  |  | s | <-URRT W1, S3 <-URRT W1, S3 -URRT W1, S3 |
|  |  |  |  |
|  |  |  |  |
| Senef ioteses | (en |  |  |
| Admintative foenes |  |  |  |
|  | coin | ${ }_{\substack{0}}^{0.007}$ |  |

PA Rate Template Part III
Talle 10.0 Plan Restes



PA Rate Template Part IV A - Individual
net for 21-Year-Old Non-Tobacco User










## PA Rate Quarterly Template Part V

## Consumer Factors

| Carrier Name: | UPMC HEALTH COVERAGE INC. |
| :--- | :--- |
| Product(s): | HMO |
| Market Segment: | Individual |
| Rate Effective Date: | $1 / 1 / 2022$ |

Table 13. Geographic Factors

| Geographic Area Factors |  |  |  |
| :--- | :--- | ---: | ---: |
| Area | Counties | Current <br> Factor | Proposed <br> Factor |
| Rating Area 1 | Crawford | 0.952 | 0.966 |
| Rating Area 2 |  |  |  |
| Rating Area 3 |  |  |  |
| Rating Area 4 |  |  |  |
| Rating Area 5 | Clearfield | 0.952 | 0.966 |
| Rating Area 6 |  |  |  |
| Rating Area 7 |  |  |  |
| Rating Area 8 |  |  |  |
| Rating Area 9 |  |  |  |

Table 14. Network Factors

| Projection Period Network Factors |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| Network Name | Rating Area | Current <br> Factor | Proposed <br> Factor | DOH <br> Approval <br> Date |
|  | 1,5 | 1.000 | 1.000 |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |



## Company Name:

Market:
Product:
Effective Date of Rates:


## Company Name:

Market:
Product:
Effective Date of Rates:

| HIOS Plan ID (On Exchange)=> | 62560PA0010122 |  | 62560PA0010123 |  | 62560PA0010123 |  | 62560PA0010124 |  | 62560PA |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| HIOS Plan ID (Off Exchange)=> | 62560PA0010122 |  | 62560PA0010123 |  | 62560PA0010123 |  | 62560PA0010124 |  | 62560PA |
| Plan Marketing Name => | trage Bronze \$6,700/\$0 - Stand ge Catastrophic \$8,700/\$0 - Sta |  |  |  | ge Catastrophic \$8,700/\$0 - Sta |  | age Gold HSA \$3,100/\$0 - Stan |  | age Gold HSA \$ |
| Form \# => | 660 |  | 660 |  | 660 |  | 676 |  | 6 |
| Rating Area => | 5 |  | 1 |  | 5 |  | 1 |  | ! |
| Network => | rral w/Dental Advantage w/De |  | rral w/Dental Advantage w/De |  | erral w/Dental Advantage w/De |  | rral w/Dental Advantage w/De |  | rral w/Dental $A$ |
| Metal => | Bronze |  | Catastrophic |  | Catastrophic |  | Gold |  | Gc |
| Deductible => | \$6700 / \$13400 |  | \$8700 / \$17400 |  | \$8700 / \$17400 |  | \$3100 / \$6200 |  | \$3100, |
| Coinsurance => | 60\% |  | 100\% |  | 100\% |  | 90\% |  | $9($ |
| Copays => | \$0/40\% |  | \$0 / \$0 |  | \$0 / \$0 |  | \$0/10\% |  | \$0/ |
| OOP Maximum => | \$8700 / \$17400 |  | \$8700 / \$17400 |  | \$8700 / \$17400 |  | \$4000 / \$8000 |  | \$4000, |
| Pediatric Dental (Yes/No) => | Yes |  | Yes |  | Yes |  | Yes |  |  |
| Age Band | Non-Tobacco | Tobacco | Non-Tobacco | Tobacco | Non-Tobacco | Tobacco |  |  |  |
| 0-14 | \$189.49 | \$189.49 | \$179.13 | \$179.13 | \$179.13 | \$179.13 | \$237.95 | \$237.95 | \$237.95 |
| 15 | \$206.33 | \$206.33 | \$195.06 | \$195.06 | \$195.06 | \$195.06 | \$259.10 | \$259.10 | \$259.10 |
| 16 | \$212.77 | \$212.77 | \$201.14 | \$201.14 | \$201.14 | \$201.14 | \$267.19 | \$267.19 | \$267.19 |
| 17 | \$219.21 | \$219.21 | \$207.23 | \$207.23 | \$207.23 | \$207.23 | \$275.28 | \$275.28 | \$275.28 |
| 18 | \$226.15 | \$226.15 | \$213.79 | \$213.79 | \$213.79 | \$213.79 | \$283.99 | \$283.99 | \$283.99 |
| 19 | \$233.09 | \$233.09 | \$220.34 | \$220.34 | \$220.34 | \$220.34 | \$292.70 | \$292.70 | \$292.70 |
| 20 | \$240.27 | \$240.27 | \$227.14 | \$227.14 | \$227.14 | \$227.14 | \$301.72 | \$301.72 | \$301.72 |
| 21 | \$247.70 | \$253.89 | \$234.16 | \$240.01 | \$234.16 | \$240.01 | \$311.05 | \$318.83 | \$311.05 |
| 22 | \$247.70 | \$253.89 | \$234.16 | \$240.01 | \$234.16 | \$240.01 | \$311.05 | \$318.83 | \$311.05 |
| 23 | \$247.70 | \$253.89 | \$234.16 | \$240.01 | \$234.16 | \$240.01 | \$311.05 | \$318.83 | \$311.05 |
| 24 | \$247.70 | \$253.89 | \$234.16 | \$240.01 | \$234.16 | \$240.01 | \$311.05 | \$318.83 | \$311.05 |
| 25 | \$248.69 | \$254.91 | \$235.10 | \$240.97 | \$235.10 | \$240.97 | \$312.29 | \$320.10 | \$312.29 |
| 26 | \$253.64 | \$259.99 | \$239.78 | \$245.77 | \$239.78 | \$245.77 | \$318.52 | \$326.48 | \$318.52 |
| 27 | \$259.59 | \$266.08 | \$245.40 | \$251.53 | \$245.40 | \$251.53 | \$325.98 | \$334.13 | \$325.98 |
| 28 | \$269.25 | \$275.98 | \$254.53 | \$260.90 | \$254.53 | \$260.90 | \$338.11 | \$346.56 | \$338.11 |
| 29 | \$277.18 | \$284.11 | \$262.03 | \$268.58 | \$262.03 | \$268.58 | \$348.06 | \$356.77 | \$348.06 |
| 30 | \$281.14 | \$288.17 | \$265.77 | \$272.42 | \$265.77 | \$272.42 | \$353.04 | \$361.87 | \$353.04 |
| 31 | \$287.08 | \$294.26 | \$271.39 | \$278.18 | \$271.39 | \$278.18 | \$360.51 | \$369.52 | \$360.51 |
| 32 | \$293.03 | \$300.35 | \$277.01 | \$283.94 | \$277.01 | \$283.94 | \$367.97 | \$377.17 | \$367.97 |
| 33 | \$296.74 | \$304.16 | \$280.52 | \$287.54 | \$280.52 | \$287.54 | \$372.64 | \$381.95 | \$372.64 |
| 34 | \$300.71 | \$308.23 | \$284.27 | \$291.38 | \$284.27 | \$291.38 | \$377.61 | \$387.06 | \$377.61 |
| 35 | \$302.69 | \$310.26 | \$286.14 | \$293.30 | \$286.14 | \$293.30 | \$380.10 | \$389.61 | \$380.10 |
| 36 | \$304.67 | \$312.29 | \$288.02 | \$295.22 | \$288.02 | \$295.22 | \$382.59 | \$392.16 | \$382.59 |
| 37 | \$306.65 | \$314.32 | \$289.89 | \$297.14 | \$289.89 | \$297.14 | \$385.08 | \$394.71 | \$385.08 |
| 38 | \$308.63 | \$316.35 | \$291.76 | \$299.06 | \$291.76 | \$299.06 | \$387.57 | \$397.26 | \$387.57 |
| 39 | \$312.60 | \$320.41 | \$295.51 | \$302.90 | \$295.51 | \$302.90 | \$392.55 | \$402.36 | \$392.55 |
| 40 | \$316.56 | \$324.47 | \$299.26 | \$306.74 | \$299.26 | \$306.74 | \$397.52 | \$407.46 | \$397.52 |
| 41 | \$322.51 | \$330.57 | \$304.88 | \$312.50 | \$304.88 | \$312.50 | \$404.99 | \$415.11 | \$404.99 |
| 42 | \$328.20 | \$336.41 | \$310.26 | \$318.02 | \$310.26 | \$318.02 | \$412.14 | \$422.44 | \$412.14 |
| 43 | \$336.13 | \$344.53 | \$317.76 | \$325.70 | \$317.76 | \$325.70 | \$422.09 | \$432.65 | \$422.09 |
| 44 | \$346.04 | \$354.69 | \$327.12 | \$335.30 | \$327.12 | \$335.30 | \$434.54 | \$445.40 | \$434.54 |
| 45 | \$357.68 | \$366.62 | \$338.13 | \$346.58 | \$338.13 | \$346.58 | \$449.16 | \$460.39 | \$449.16 |
| 46 | \$371.55 | \$380.84 | \$351.24 | \$360.02 | \$351.24 | \$360.02 | \$466.58 | \$478.24 | \$466.58 |
| 47 | \$387.16 | \$396.83 | \$365.99 | \$375.14 | \$365.99 | \$375.14 | \$486.17 | \$498.33 | \$486.17 |
| 48 | \$404.99 | \$415.11 | \$382.85 | \$392.42 | \$382.85 | \$392.42 | \$508.57 | \$521.28 | \$508.57 |
| 49 | \$422.58 | \$433.14 | \$399.48 | \$409.46 | \$399.48 | \$409.46 | \$530.65 | \$543.92 | \$530.65 |
| 50 | \$442.39 | \$453.45 | \$418.21 | \$428.67 | \$418.21 | \$428.67 | \$555.54 | \$569.42 | \$555.54 |
| 51 | \$461.96 | \$473.51 | \$436.71 | \$447.63 | \$436.71 | \$447.63 | \$580.11 | \$594.61 | \$580.11 |
| 52 | \$483.51 | \$495.60 | \$457.08 | \$468.51 | \$457.08 | \$468.51 | \$607.17 | \$622.35 | \$607.17 |
| 53 | \$505.31 | \$517.94 | \$477.69 | \$489.63 | \$477.69 | \$489.63 | \$634.54 | \$650.41 | \$634.54 |
| 54 | \$528.84 | \$542.06 | \$499.93 | \$512.43 | \$499.93 | \$512.43 | \$664.09 | \$680.69 | \$664.09 |
| 55 | \$552.37 | \$566.18 | \$522.18 | \$535.23 | \$522.18 | \$535.23 | \$693.64 | \$710.98 | \$693.64 |
| 56 | \$577.88 | \$592.33 | \$546.30 | \$559.95 | \$546.30 | \$559.95 | \$725.68 | \$743.82 | \$725.68 |
| 57 | \$603.64 | \$618.74 | \$570.65 | \$584.91 | \$570.65 | \$584.91 | \$758.03 | \$776.98 | \$758.03 |
| 58 | \$631.14 | \$646.92 | \$596.64 | \$611.56 | \$596.64 | \$611.56 | \$792.56 | \$812.37 | \$792.56 |
| 59 | \$644.76 | \$660.88 | \$609.52 | \$624.76 | \$609.52 | \$624.76 | \$809.66 | \$829.90 | \$809.66 |
| 60 | \$672.26 | \$689.06 | \$635.51 | \$651.40 | \$635.51 | \$651.40 | \$844.19 | \$865.29 | \$844.19 |
| 61 | \$696.04 | \$713.44 | \$657.99 | \$674.44 | \$657.99 | \$674.44 | \$874.05 | \$895.90 | \$874.05 |
| 62 | \$711.64 | \$729.43 | \$672.74 | \$689.56 | \$672.74 | \$689.56 | \$893.65 | \$915.99 | \$893.65 |
| 63 | \$731.21 | \$749.49 | \$691.24 | \$708.52 | \$691.24 | \$708.52 | \$918.22 | \$941.18 | \$918.22 |
| 64+ | \$743.10 | \$761.68 | \$702.48 | \$720.04 | \$702.48 | \$720.04 | \$933.15 | \$956.48 | \$933.15 |

## Company Name:

Market:
Product:
Effective Date of Rates:

| HIOS Plan ID (On Exchange)=> | 0010124 | 62560PA0010125 |  | 62560PA0010125 |  | 62560PA0010126 |  | 62560PA0010126 |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| HIOS Plan ID (Off Exchange)=> | 0010124 | 62560PA0010125 |  | 62560PA0010125 |  | 62560PA0010126 |  | 62560PA0010126 |  |
| Plan Marketing Name => | 3,100/\$0 - Stantage Silver \$1,500/\$75 - Stand |  |  | tage Silver \$1,500/\$75 - Stand |  | ntage Silver \$6,800/\$0 - Standa |  | ntage Silver \$6,800/\$0 - Stand |  |
| Form \# => | 76 | 660 |  | 660 |  | 660 |  | 660 |  |
| Rating Area => | 5 | 1 |  | 5 |  | 1 |  | 5 |  |
| Network => | dvantage w/Derral w/Dental Advantage w/De |  |  | rral w/Dental Advantage w/De |  | rral w/Dental Advantage w/De |  | rral w/Dental Advantage w/De |  |
| Metal => | pld | Silver |  |  |  | Silver |  | Silver |  |
| Deductible => | \$ 6200 | \$1500 / \$3000 |  | \$1500 / \$3000 |  | \$6800 / \$13600 |  | \$6800 / \$13600 |  |
| Coinsurance => | \% | 60\% |  | 60\% |  | 60\% |  | 60\% |  |
| Copays => | 10\% | \$75 / \$10 |  | \$75 / \$10 |  | \$0 / \$40 |  | \$0 / \$40 |  |
| OOP Maximum => | \% $\$ 8000$ | \$8700 / \$17400 |  | \$8700 / \$17400 |  | \$8700 / \$17400 |  | \$8700 / \$17400 |  |
| Pediatric Dental (Yes/No) => | es | Yes |  | Yes |  | Yes |  | Yes |  |
| Age Band | Tobacco | Non-Tobacco | Tobacco | Non-Tobacco | Tobacco | Non-Tobacco | Tobacco | Non-Tobacco | Tobacco |
| 0-14 | \$237.95 | \$316.35 | \$316.35 | \$316.35 | \$316.35 | \$329.81 | \$329.81 | \$329.81 | \$329.81 |
| 15 | \$259.10 | \$344.47 | \$344.47 | \$344.47 | \$344.47 | \$359.13 | \$359.13 | \$359.13 | \$359.13 |
| 16 | \$267.19 | \$355.22 | \$355.22 | \$355.22 | \$355.22 | \$370.34 | \$370.34 | \$370.34 | \$370.34 |
| 17 | \$275.28 | \$365.97 | \$365.97 | \$365.97 | \$365.97 | \$381.55 | \$381.55 | \$381.55 | \$381.55 |
| 18 | \$283.99 | \$377.55 | \$377.55 | \$377.55 | \$377.55 | \$393.62 | \$393.62 | \$393.62 | \$393.62 |
| 19 | \$292.70 | \$389.13 | \$389.13 | \$389.13 | \$389.13 | \$405.69 | \$405.69 | \$405.69 | \$405.69 |
| 20 | \$301.72 | \$401.12 | \$401.12 | \$401.12 | \$401.12 | \$418.20 | \$418.20 | \$418.20 | \$418.20 |
| 21 | \$318.83 | \$413.53 | \$423.87 | \$413.53 | \$423.87 | \$431.13 | \$441.91 | \$431.13 | \$441.91 |
| 22 | \$318.83 | \$413.53 | \$423.87 | \$413.53 | \$423.87 | \$431.13 | \$441.91 | \$431.13 | \$441.91 |
| 23 | \$318.83 | \$413.53 | \$423.87 | \$413.53 | \$423.87 | \$431.13 | \$441.91 | \$431.13 | \$441.91 |
| 24 | \$318.83 | \$413.53 | \$423.87 | \$413.53 | \$423.87 | \$431.13 | \$441.91 | \$431.13 | \$441.91 |
| 25 | \$320.10 | \$415.18 | \$425.56 | \$415.18 | \$425.56 | \$432.85 | \$443.68 | \$432.85 | \$443.68 |
| 26 | \$326.48 | \$423.45 | \$434.04 | \$423.45 | \$434.04 | \$441.48 | \$452.51 | \$441.48 | \$452.51 |
| 27 | \$334.13 | \$433.38 | \$444.21 | \$433.38 | \$444.21 | \$451.82 | \$463.12 | \$451.82 | \$463.12 |
| 28 | \$346.56 | \$449.51 | \$460.74 | \$449.51 | \$460.74 | \$468.64 | \$480.35 | \$468.64 | \$480.35 |
| 29 | \$356.77 | \$462.74 | \$474.31 | \$462.74 | \$474.31 | \$482.43 | \$494.50 | \$482.43 | \$494.50 |
| 30 | \$361.87 | \$469.36 | \$481.09 | \$469.36 | \$481.09 | \$489.33 | \$501.57 | \$489.33 | \$501.57 |
| 31 | \$369.52 | \$479.28 | \$491.26 | \$479.28 | \$491.26 | \$499.68 | \$512.17 | \$499.68 | \$512.17 |
| 32 | \$377.17 | \$489.21 | \$501.44 | \$489.21 | \$501.44 | \$510.03 | \$522.78 | \$510.03 | \$522.78 |
| 33 | \$381.95 | \$495.41 | \$507.79 | \$495.41 | \$507.79 | \$516.49 | \$529.41 | \$516.49 | \$529.41 |
| 34 | \$387.06 | \$502.03 | \$514.58 | \$502.03 | \$514.58 | \$523.39 | \$536.48 | \$523.39 | \$536.48 |
| 35 | \$389.61 | \$505.33 | \$517.97 | \$505.33 | \$517.97 | \$526.84 | \$540.01 | \$526.84 | \$540.01 |
| 36 | \$392.16 | \$508.64 | \$521.36 | \$508.64 | \$521.36 | \$530.29 | \$543.55 | \$530.29 | \$543.55 |
| 37 | \$394.71 | \$511.95 | \$524.75 | \$511.95 | \$524.75 | \$533.74 | \$547.08 | \$533.74 | \$547.08 |
| 38 | \$397.26 | \$515.26 | \$528.14 | \$515.26 | \$528.14 | \$537.19 | \$550.62 | \$537.19 | \$550.62 |
| 39 | \$402.36 | \$521.87 | \$534.92 | \$521.87 | \$534.92 | \$544.09 | \$557.69 | \$544.09 | \$557.69 |
| 40 | \$407.46 | \$528.49 | \$541.70 | \$528.49 | \$541.70 | \$550.98 | \$564.76 | \$550.98 | \$564.76 |
| 41 | \$415.11 | \$538.42 | \$551.88 | \$538.42 | \$551.88 | \$561.33 | \$575.36 | \$561.33 | \$575.36 |
| 42 | \$422.44 | \$547.93 | \$561.63 | \$547.93 | \$561.63 | \$571.25 | \$585.53 | \$571.25 | \$585.53 |
| 43 | \$432.65 | \$561.16 | \$575.19 | \$561.16 | \$575.19 | \$585.04 | \$599.67 | \$585.04 | \$599.67 |
| 44 | \$445.40 | \$577.70 | \$592.14 | \$577.70 | \$592.14 | \$602.29 | \$617.35 | \$602.29 | \$617.35 |
| 45 | \$460.39 | \$597.14 | \$612.07 | \$597.14 | \$612.07 | \$622.55 | \$638.12 | \$622.55 | \$638.12 |
| 46 | \$478.24 | \$620.30 | \$635.80 | \$620.30 | \$635.80 | \$646.70 | \$662.86 | \$646.70 | \$662.86 |
| 47 | \$498.33 | \$646.35 | \$662.51 | \$646.35 | \$662.51 | \$673.86 | \$690.70 | \$673.86 | \$690.70 |
| 48 | \$521.28 | \$676.12 | \$693.02 | \$676.12 | \$693.02 | \$704.90 | \$722.52 | \$704.90 | \$722.52 |
| 49 | \$543.92 | \$705.48 | \$723.12 | \$705.48 | \$723.12 | \$735.51 | \$753.90 | \$735.51 | \$753.90 |
| 50 | \$569.42 | \$738.56 | \$757.03 | \$738.56 | \$757.03 | \$770.00 | \$789.25 | \$770.00 | \$789.25 |
| 51 | \$594.61 | \$771.23 | \$790.51 | \$771.23 | \$790.51 | \$804.06 | \$824.16 | \$804.06 | \$824.16 |
| 52 | \$622.35 | \$807.21 | \$827.39 | \$807.21 | \$827.39 | \$841.57 | \$862.60 | \$841.57 | \$862.60 |
| 53 | \$650.41 | \$843.60 | \$864.69 | \$843.60 | \$864.69 | \$879.51 | \$901.49 | \$879.51 | \$901.49 |
| 54 | \$680.69 | \$882.89 | \$904.96 | \$882.89 | \$904.96 | \$920.46 | \$943.47 | \$920.46 | \$943.47 |
| 55 | \$710.98 | \$922.17 | \$945.23 | \$922.17 | \$945.23 | \$961.42 | \$985.46 | \$961.42 | \$985.46 |
| 56 | \$743.82 | \$964.77 | \$988.88 | \$964.77 | \$988.88 | \$1,005.83 | \$1,030.97 | \$1,005.83 | \$1,030.97 |
| 57 | \$776.98 | \$1,007.77 | \$1,032.97 | \$1,007.77 | \$1,032.97 | \$1,050.66 | \$1,076.93 | \$1,050.66 | \$1,076.93 |
| 58 | \$812.37 | \$1,053.67 | \$1,080.02 | \$1,053.67 | \$1,080.02 | \$1,098.52 | \$1,125.98 | \$1,098.52 | \$1,125.98 |
| 59 | \$829.90 | \$1,076.42 | \$1,103.33 | \$1,076.42 | \$1,103.33 | \$1,122.23 | \$1,150.29 | \$1,122.23 | \$1,150.29 |
| 60 | \$865.29 | \$1,122.32 | \$1,150.38 | \$1,122.32 | \$1,150.38 | \$1,170.09 | \$1,199.34 | \$1,170.09 | \$1,199.34 |
| 61 | \$895.90 | \$1,162.02 | \$1,191.07 | \$1,162.02 | \$1,191.07 | \$1,211.48 | \$1,241.76 | \$1,211.48 | \$1,241.76 |
| 62 | \$915.99 | \$1,188.07 | \$1,217.77 | \$1,188.07 | \$1,217.77 | \$1,238.64 | \$1,269.60 | \$1,238.64 | \$1,269.60 |
| 63 | \$941.18 | \$1,220.74 | \$1,251.26 | \$1,220.74 | \$1,251.26 | \$1,272.70 | \$1,304.51 | \$1,272.70 | \$1,304.51 |
| 64+ | \$956.48 | \$1,240.59 | \$1,271.60 | \$1,240.59 | \$1,271.60 | \$1,293.39 | \$1,325.72 | \$1,293.39 | \$1,325.72 |



## Company Name UPMC Health Coverage, Inc. <br> Market Individual <br> RATES FOR AGE 21, NON-TOBACCO USER, BY RATING AREA AND COUNTY

RATING AREA 1

|  | 02-01-2021 Number of Covered Lives by Rating County |  |  |  | 1,252 | 0 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| HIOS Plan ID | Plan Marketing Name | Product | Metal | $\begin{gathered} \text { On/Off } \\ \text { Exchange } \end{gathered}$ | Crawford | Clarion |
| 62560PA0010116 | UPMC Advantage Gold \$1,000/\$10-Standard Network | HMO | Gold | On/Off | \$356.64 |  |
| 62560PA0010117 | UPMC Advantage Silver \$3,500/\$40-Standard Network | HMO | Silver | On/Off | \$412.07 |  |
| 62560PA0010118 | UPMC Advantage Silver \$3,000/\$50-Standard Network | HMO | Silver | Off | \$310.39 |  |
| 62560PA0010120 | UPMC Advantage Silver HSA \$3,100/\$0 - Standard Network | HMO | Silver | Off | \$298.12 |  |
| 62560PA0010122 | UPMC Advantage Bronze \$6,700/\$0 - Standard Network | HMO | Bronze | On/Off | \$247.70 |  |
| 62560PA0010123 | UPMC Advantage Catastrophic \$8,700/\$0 - Standard Network | HMO | Catastrophic | On/Off | \$234.16 |  |
| 62560PA0010124 | UPMC Advantage Gold HSA \$3,100/\$0 - Standard Network | HMO | Gold | On/Off | \$311.05 |  |
| 62560PA0010125 | UPMC Advantage Silver \$1,500/\$75-Standard Network | HMO | Silver | On/Off | \$413.53 |  |
| 62560PA0010126 | UPMC Advantage Silver \$6,800/\$0 - Standard Network | HMO | Silver | On/Off | \$431.13 |  |


| 46 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Erie | Forest | Mckean | Mercer | Venango | Warren | Elk | Cameron | Potter | Bradford | Carbon | Clinton | Lackawanna | Luzerne |


| 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Lycoming | Monroe | Pike | Sullivan | Susquehanna | Tioga | Wayne | Wyoming | Allegheny | Armstrong | Beaver | Butler | Fayette | Greene |


|  |  |  |  | RATING AREA 5 |  |  |  |  |  |  | RATING AR |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 6 | 0 | 0 | 0 | 0 | 0 | 1,592 | 7 | 0 | 9 | 0 | 42 |
| Indiana | Lawrence | Washington | Westmoreland | Bedford | Blair | Clearfield | Cambria | Huntingdon | Jefferson | Somerset | Centre |
|  |  |  |  |  |  | \$356.64 |  |  |  |  |  |
|  |  |  |  |  |  | \$412.07 |  |  |  |  |  |
|  |  |  |  |  |  | \$310.39 |  |  |  |  |  |
|  |  |  |  |  |  | \$298.12 |  |  |  |  |  |
|  |  |  |  |  |  | \$247.70 |  |  |  |  |  |
|  |  |  |  |  |  | \$234.16 |  |  |  |  |  |
|  |  |  |  |  |  | \$311.05 |  |  |  |  |  |
|  |  |  |  |  |  | \$413.53 |  |  |  |  |  |
|  |  |  |  |  |  | \$431.13 |  |  |  |  |  |


| 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Columbia | Lehigh | Mifflin | Montour | Northampton | Northumberland | Schuylkill | Snyder | Union | Adams | Berks | Lancaster | York |  |

RATING AREA 8

| 0 | 0 | 0 | 0 | 0 |
| :---: | :---: | :---: | :---: | :---: |
| Bucks | Chester | Delaware | Montgomery | Philadelphia |

RATING AREA 9

| 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Cumberland | Dauphin | Franklin | Fulton | Juniata | Lebanon | Perry |




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 1 | 0.9660 |
| Rating Area 5 | 0.9660 |

# RFJ Part II - Consumer Friendly Justification <br> Individual Exchange HMO Rate Filing 

The rate change for UPMC Health Coverage Individual plans is $2.51 \%$ for 2022 . Rate change drivers include the following: Increasing cost and utilization of medical trends.

## Scope and Range of the Rate Increase

The number of individuals affected by this rate increase is 2,954 . The proposed rate increase varies by plan due to various changes made to meet $A V$ requirements on a plan-by-plan basis. The range of the proposed rate change is $-0.50 \%$ to $8.04 \%$.

Financial Experience of the Product

| Premiums | $\$$ | 10,915 |
| :--- | ---: | ---: |
| Claims | $\$$ | 162 |
| Administrative expenses | $\$$ | 1,957 |
| Taxes \& fees | $\$$ | 409 |
| Company made (after taxes) | $\mathbf{\$}$ | $\mathbf{8 , 3 8 7}$ |

## Changes in Medical Service Costs

Cost and utilization increases are expected to increase by approximately $6.30 \%$ for 2022.

## Changes in Benefits

No changes in benefits contributed significantly to the increase.

Administrative Costs and Anticipated Profits

No major changes in administrative costs are anticipated. A profit margin of 0\% is anticipated for 2022.

## RFJ Part III: Actuarial Memorandum

## General Information

The purpose of this actuarial memorandum is to provide certain information related to a rate submission for the company identified below. The relevant index rate is developed in accordance with federal regulations, and plan specific premiums are generated using the allowable modifiers in accordance with the single risk pool rule.

The following section provides information related to the identification of the company that is submitting this rate filing. Much of this information is also displayed in Table 0 of the PA Actuarial Memorandum Exhibits.

Company Identifying Information:
Company Legal Name: UPMC Health Coverage, Inc.
NAIC \#: 15451
State: PA
HIOS Issuer ID: 62560
Market: Individual
Exchange: On and Off Exchange
Products: HMO
Effective Date: 1/1/2022


Filing Information:
Rate Filing SERFF Tracking \#: UPMC-132801380
Form Filing SERFF Tracking \#: UPMC-132820850, UPMC-132820832
Binder SERFF Tracking \#: UPMC-PA22-125107506

Rate History:
Historical rate increases for the captioned company and market are presented in the table below.

| SERFF Tracking \# | Year | Rate Change |
| :--- | :---: | :---: |
| UPMC-129629050 | 2014 | $0.0 \%$ |
| UPMC-129640573 | 2015 | $0.0 \%$ |
| UPMC-130072609 | 2016 | $0.0 \%$ |
| UPMC-130536761 | 2017 | $9.3 \%$ |
| UPMC-131034852 | 2018 | $-8.3 \%$ |
| UPMC-131496004 | 2019 | $12.1 \%$ |
| UPMC-131943282 | 2020 | $2.2 \%$ |
| UPMC-132364646 | 2021 | N/A* |

[^2]
## Proposed Rate Increase(s)

Reasons for Rate Increase(s):
The proposed rate increase calculated for HMO products in section I, worksheet 2 of the URRT is 2.5\%

The major reasons for the increase include the following:

- Increasing cost and utilization trends


## Market Experience

## Single Risk Pool

The single risk pool consists of members that are anticipated to enroll in ACA-compliant policies offered under the captioned market.

## Experience Period Premium and Claims

Paid Through Date:
The reported claims during the experience period have a paid through date of February 2021.

Current Date:
Current enrollment and premium data is reported as of February 15, 2021.

## Premiums (net of MLR Rebate) in Experience Period:

Section I, worksheet 1 of the URRT contains calendar year 2020 premium for all non-grandfathered policies in the single risk pool for the captioned company and market. No adjustments were made for MLR rebates as we do not anticipate owing them. HHS cost-sharing is not included in the premium data. Please note that the earned premium is also listed in Table 2 of the PA Actuarial Memorandum Exhibits.

## Allowed and Incurred Claims Incurred During the Experience Period:

Section I, worksheet 1 of the URRT contains calendar year 2020 claims experience for all non-grandfathered policies in the single risk pool for the captioned company and market, paid through February 2021. Allowed medical, pharmacy, and pediatric vision claims are pulled directly from our data warehouse. Pediatric dental claims were administered and paid by Dominion Dental during the experience period. We received a separate report from Dominion with the claim detail. We used the standard Development/Completion Factor Method to calculate IBNR. Factors were calculated using our entire block of ACA-related Individual business. The lower-thanexpected factor for January 2020 can be attributed to a catasrophic claim that has not yet been paid. Because two months run-out is available the impact of IBNR is minimal.

| Month | Completion Factor |
| :---: | :---: |
| $1 / 1 / 2020$ | 0.9940 |
| $2 / 1 / 2020$ | 0.9999 |
| $3 / 1 / 2020$ | 0.9998 |
| $4 / 1 / 2020$ | 0.9996 |
| $5 / 1 / 2020$ | 0.9991 |
| $6 / 1 / 2020$ | 0.9979 |
| $7 / 1 / 2020$ | 0.9973 |
| $8 / 1 / 2020$ | 0.9879 |
| $9 / 1 / 2020$ | 0.9927 |
| $10 / 1 / 2020$ | 0.9882 |
| $11 / 1 / 2020$ | 0.9775 |
| $12 / 1 / 2020$ | 0.9486 |

## Benefit Categories

Medical claims are split into nine categories in our data warehouse. They are mapped into the categories in the URRT as follows:

| UPMC Benefit Category | URRT Benefit Category |
| :---: | :---: |
| Inpatient | Inpatient Hospital |
| Catastrophic | Inpatient Hospital |
| Outpatient | Outpatient Hospital |
| Behavioral | Outpatient Hospital |
| PCP | Professional |
| Specialist | Professional |
| Diagnostic | Other Medical |
| ER | Other Medical |
| Other | Other Medical |
| Pediatric Dental | Other Medical |
| Pediatric Vision | Other Medical |

Drug claims are in separate tables and directly mapped into the Prescription Drugs category. Note that services are the unit of measurement used for the Other Medical category. Pediatric dental claims were paid for via capitation during the experience period, but this will no longer be the case beginning with the 2022 plan year when they will be administered and paid by UPMC. Because of this change, pediatric dental claims have been mapped into the Other Medical category within the URRT.

## Projection Factors

## Trend Factors (cost/utilization):

The overall annual trend used in rate development is $6.30 \%$. Historical allowed claims for our Individual block of ACA-compliant business were used to develop year-over-year trend factors for use in the projected rates. The large enrollment count and consistent makeup of this population make it appropriate for use in trend development for this filing. Service categories were defined to be consistent with the URRT instructions. Please
see Tables 3 and 3b of the PA Actuarial Memorandum Exhibits for trend development calculations. Please note that the minor changes made to benefit designs in order to keep plan actuarial values within the allowed ranges were not significant enough to warrant an adjustment for induced demand with regard to trend, so the induced demand column has been populated with zeroes in Tables 3 and 3b. Changes in provider contracting were considered but were ultimately assumed to have negligible impact on trend. Please see Exhibit 5 of the Supporting Exhibits for trend development. Please note that data for calendar year 2020 in this exhibit was adjusted to remove the effects of COVID-19 using the methodology described in the paragraph below addressing the Change in Other adjustment.

## Adjustments to Trended EHB Allowed Claims PMPM

Changes in the Morbidity of the Population Insured:
For 2022, the Pennsylvania Insurance Department has mandated that an adjustment factor of 0.999 is applied to the index rate to reflect the morbidity impact of the state-based reinsurance program in the Individual market. It has also been mandated that the Individual Adjustment factor of 1.01 be applied to the index rate to reflect current uncertainty surrounding the market in 2022 due to the repeal of the Individual Mandate. An additional load of 0.990 has been applied within the overall morbidity adjustment. This load accounts for healthier members that will move into the single risk pool as a result of the expanded subsidization offered under the American Rescue Plan Act.

## Changes in Benefits:

No changes were made to the PA EHB Benchmark plan for 2022, so no adjustments were necessary.

## Changes in Demographics:

The average age for our experience period Individual risk pool was 45.5 with an average premium factor of 1.90 . This is identical to our 2021 experience so far with age 45.5 and premium factor 1.90 . The lack of change in factors suggests that the insured population is stable, and no additional adjustment for demographics was deemed necessary.

## Other Adjustments:

An adjustment factor of 1.285 has been applied to the index rate to account for changes in network between the experience and projection period populations. Coverage was only offered in Crawford and Clearfield counties beginning in 2021, which is not reflected in the experience data. This adjustment factor is used to bring the experience data in line with the characteristics of the provider network included in these counties in 2022. Please see Exhibit 6 of the Supporting Exhibits for the derivation of this factor.

An adjustment factor of 1.076 has been applied to the index rate in the Change for Other category. This adjustment removes the effects of COVID-19 from the experience period data, bringing the Index Rate of Projection Period in line with expected claims experience for 2022. This factor was derived by determining the ratio of the Index Rate of Experience Period including COVID-19 medical claims adjustments to the Index Rate of Experience Period calculated using the raw, unadjusted data. Please see Exhibit 8 of the Supporting Exhibits for the derivation of this factor. Claims values included in the calculation of the former of these index rates have been adjusted at the medical service category level (no adjustments were applied to pharmacy claims). These service-level adjustments were developed by using trended and seasonality-adjusted 2019 ACA medical claims experience as a baseline for expected 2020 claims experience excluding the effects of COVID-19 and comparing this projected experience to actual claims experience from 2020.

## Credibility Manual Rate Development

Source and Appropriateness of Manual Rate Used:
The equivalent experience period data for UPMC Health Options, Inc. Individual single risk pool product was used. It represents the same risk pool as UPMC Health Coverage, Inc. and has a large member month count of over $1,440,422$. Therefore, it has been deemed credible to use.

Adjustments Made to the Data:
Adjustments made to the manual data are discussed in the "Projection Factors" section above.

## Inclusion of Capitation Payments:

As mentioned above in the Benefit Categories section, pediatric dental claims were paid for via capitation during the experience period, but this will no longer be the case beginning with the 2022 plan year when they will be administered and paid by UPMC.

## Credibility of Experience

The very limited experience period enrollment of 36 member months requires $0 \%$ credibility to be used for the experience period data, as was implemented in prior filings by this company.

## Establishing the Index Rate

For this filing, the Index Rate of the Experience Period is set equal to the manual rate due to the lack of credibility. As discussed above, the manual rate is developed using fully-credible experience period EHB claims data from ACA-related Individual business under the UPMC Health Options legal entity. The calculation of the manual rate is shown in Table 2b of the PA Actuarial Memorandum Exhibits. The Index Rate of the Projection Period is then calculated in Table 5 by applying two years of $6.30 \%$ annual trend to the experience period manual rate. The adjustments described in the Projection Factors section above were then applied to the trended manual rate to generate the Index Rate of the Projection Period. Please note that the Index Rate of Projection Period of $\$ 772.96$ shown in Table 5 matches the corresponding value shown in section II, worksheet 1 of the URRT. Claims for routine foot care and acupuncture were not included in the calculation of the index rates despite being covered during the experience period since they are classified as non-EHBs.

## Paid to Allowed Ratio

The Paid to Allowed Average Factor was calculated by taking the weighted average of the company-determined Actuarial Values for all plans using current membership as demonstrated in Table 10 of the PA Actuarial Memorandum Exhibits.

## Development of the Market Adjusted Index Rate

The Projected Index Rate is adjusted by adding estimates for Risk Adjustment and Marketplace Fees (with impacts and costs spread across the whole risk pool) to obtain the projected Market Adjusted Index Rate. Derivation of the PMPM values used for the Risk Adjustment, Marketplace Fees adjustments, and projected Reinsurance recoveries are described in the following sections.

Experience Period Risk Adjustment and Reinsurance Adjustments PMPM:
Experience period Risk Adjustment was estimated to be a payment of $\$ 7,691$ per the Summary Report on Permanent Risk Adjustment Transfers for the 2020 Benefit Year published by CMS on June 30, 2021, which translates to a PMPM of $\$ 213.63$. No data for the Transitional Reinsurance Program under PPACA has been included as this program expired at the end of 2016.

## Projected Risk Adjustments PMPM:

Projection period Risk Adjustment PMPM has been estimated to be a payment of $\$ 19.09$, which is displayed in Table 5 and is based on the risk profile of the underlying manual population. The value entered in section II, worksheet 1 of the URRT was $\$ 24.52$ since the calculation of the Market Adjusted Index Rate is done on an allowed claims basis in the URRT. The updated PMPM was derived by taking the original paid PMPM divided by the Paid to Allowed Average Factor. The net amount after accounting for the fee is subtracted from the Index Rate of the Projection Period as part of the calculation of the Market Adjusted Index Rate. For the URRT and Table 5 of the PA Actuarial Memorandum Rate Exhibits, it was entered as a negative number because the calculation subtracts this value. The effect is an increase in premium as additional revenue will be required to cover the anticipated payment.

## Exchange User Fees:

The member-weighted average of a 3.0\% Marketplace User Fee for Marketplace enrollees combined with 0\% for non-Marketplace enrollees calculates to $2.3 \%$. This load is developed based on fees from on-exchange policies, but is spread over all policies uniformly. This translates to a PMPM of $\$ 15.35$, which was entered as a positive value in Table 5 since the calculation adds this value. The effect for this adjustment is an increase in premium as additional revenue will be required to cover the anticipated payment. Since the URRT requires the exchange user fee to be listed on an "allowed" basis, the final value included in the URRT was calculated by first taking exchange user fee PMPM of \$15.35 divided by the paid-to-allowed ratio to derive the "allowed" exchange user fee PMPM. This value was then divided by the market adjusted index rate to arrive at the final value of $2.6 \%$.

## Estimated Reinsurance Recoveries PMPM:

The index rate was further adjusted by accounting for estimated recoveries from the state-based reinsurance program. Estimated recoveries applied in Table 5 and section II, worksheet 1 of the URRT were \$36.08 PMPM and \$46.35 PMPM, respectively. The value entered in the URRT is different since the calculation of the Market Adjusted Index Rate is done on an allowed claims basis in the URRT. The updated PMPM was derived by taking the original PMPM divided by the Paid to Allowed Average Factor. These values were entered as positive values in Table 5 and the URRT since the calculation subtracts these values. The effect for this adjustment is a decrease in premium as less revenue will be required due to the anticipated recovery.

The estimated recovery of $\$ 36.08$ PMPM was derived using data entered into tabs II.a and II.b of the PA Actuarial Memorandum exhibits. Data entered into tab II.a matches the manual experience period data
described in the sections above. Tab II.b was populated by referencing the same source of experience captured in tab II.a, but the member-level incurred claims were trended forward two years to the projection period and adjusted to remove the effects of COVID-19 before allocating the data to each bin within the continuance table. Annual claims trends of $6.30 \%$ and a COVID-19 adjustment factor of 1.076 were applied to estimate the projected member-level claims used to populate tab II.b.

## Non-Benefit Expenses and Profit \& Risk

## Administrative Expense Load:

Administrative costs of $9.6 \%$ of premium have been displayed in Table 6 and the URRT. This value has been derived from projected administrative costs for the projection period. These expenses are assumed to be uniform for all plan designs.


Profit \& Risk Margin:
The projected profit margin for this company has been decreased from $2 \%$ in 2021 to $0 \%$ in 2022. This value is listed in both Table 6 and the URRT. The same level of profit margin is expected for each plan included in this filing.

## Taxes and Fees:

Taxes and Fees will remain at approximately $0.1 \%$ in 2022. This load accounts for the projected Federal Income Tax in 2022. Please note that the Risk Adjustment Administration Fee of $\$ 0.25$ PMPM and the projected PCORI Fee of $\$ 0.22$ PMPM were included in the Taxes and Fees field in Table 6 and the URRT.

## Plan Adjusted Index Rates

Table 10 of the PA Actuarial Memorandum Exhibits has been populated as described in federal and state guidance to develop 2022 Plan Adjusted Index Rates. The allowable modifiers that are used in rate development are described below.

## Plan Actuarial Value:

The AV for each plan was determined by the issuer's own pricing model based on experience from UPMC's fullyinsured commercial block of business. This model calculates an AV for a given plan by first trending 2019 allowed claims data forward three years to the projection period, calculating paid amounts for each benefit category based on the benefit design of a given plan and projected allowed claims data, and taking the ratio of the total projected paid claims to projected allowed claims. Since the same tool was used for all plans, this eliminates any impact from morbidity at the plan level, and differing rate increases by product type are purely based on differences in benefit design for all plans within a given product.

## Benefit Richness (induced demand)

Benefit richness factors were calculated using the formula (Plan $A V)^{\wedge} 2-(P l a n A V)+1.24$, where (Plan $\left.A V\right)$ is equal to the product of the Plan AV described above and the Non-Funding of CSR Adjustment described below on a plan-by-plan basis. This formula was prescribed by the Pennsylvania Insurance Department and has been developed to produce induced demand factors that mimic those determined by HHS. The initial factors calculated using this formula were then normalized against projected membership by plan.

## Benefits in addition to EHBs

Benefits that will be offered outside EHB include routine foot care and acupuncture. The projected allowed claims for these benefits is $\$ 1.35$ PMPM. The adjustment factor of 1.002 included in Table 10 has been derived by adding the aforementioned PMPM to the projected index rate for 2022 and dividing this total by the same index rate, causing the adjustment to be applied uniformly to all plans.

## Provider Network

Since only one network is included in this filing, no network adjustments were deemed necessary for 2022.

## Catastrophic Eligibility

No adjustments were made for catastrophic plans. Current enrollment is minimal and not credible.

## Non-Funding of CSR Adjustment

To account for the elimination of funding for cost-share reduction subsidies, the Pennsylvania Insurance Department has mandated the rates for all silver plans offered both on and off the Federal Marketplace be increased by a factor of 1.22 in Table 10 of the Actuarial Memorandum Rate Exhibits. Several off-exchange only silver plans have been included for 2022 to minimize disruption to non-subsidized members enrolled in silver plans.

## Calibration

## Age Curve Calibration:

The average age factor was calculated using our projected ACA-related Individual population with the prescribed HHS Age Factors for 2022. It was assumed this represents the age distribution of the entire single risk-pool. The number of members under each age bracket was multiplied by the corresponding HHS Age Factor. These were then summed and divided by the total number of members to obtain the average age factor. For UPMC's entire block of ACA-compliant Individual business, the average age factor is 1.900 and average age was 45.5 during the experience period. This preliminary age factor is then multiplied by an adjustment factor of 0.997 , which accounts for the regulation that prohibits charging for more than three children per family, resulting in a final age calibration factor of 1.895. Please see Exhibit 3 in the Supporting Exhibits for the calculation of this factor.

## Geographic Factor Calibration:

The geographic rating areas used within this filing are the same as those defined by the state. To better reflect the varying costs of delivery between each geographical region in which coverage is offered, rating area factors have been updated for 2022. The table below summarizes changes in these factors:

| Region | $\mathbf{2 0 2 1}$ | $\mathbf{2 0 2 2}$ |
| :---: | :---: | :---: |
| 1 | 0.95 | 0.97 |
| 5 | 0.95 | 0.97 |

The calibration factor of 0.965 was calculated as the weighted average of the geographical factors using projected enrollment for the single risk pool, as shown in Exhibit 4 of the Supporting Exhibits.

## Tobacco Use Rating Factor Calibration:

The average tobacco factor was calculated using projected membership, which is assumed to have the same split for tobacco status as current membership. The member-weighted average of a $2.5 \%$ load applied for enrollees who qualify as tobacco users combined with a $0 \%$ load for non-tobacco users yields an average tobacco factor of 1.002 . The derivation of this factor is shown below.

| Tobacco Status | Feb 2021 Enrollment <br> Split | Tobacco Factor | Calibration Factor |
| :---: | :---: | :---: | :---: |
| Non-User | $92.7 \%$ | 1.000 | 0.927 |
| User | $7.3 \%$ | 1.025 | 0.075 |
| Total | $100.0 \%$ |  | $\mathbf{1 . 0 0 2}$ |

## Consumer Adjusted Premium Rate Development

Table 11 of the PA Actuarial Memorandum Exhibits has been populated as described in federal and state guidance. 2022 rates calculated in this tables were tested to ensure that they match those included in the PA Plan Design Summary and Rate Tables, Federal Rates Template, and the binder. The Plan Adjusted Index Rates are divided by the age calibration factor then multiplied by the specific age, geographic, and tobacco factors shown in Tables 12, 13, and 14 of the PA Actuarial Memorandum Exhibits, respectively, to develop the Consumer Adjusted Premium Rates.

## Projected Loss Ratio

The projected period loss ratio, using the federally-prescribed MLR methodology without the credibility adjustment, is $82.2 \%$, as shown in Exhibit 1 of the Supporting Exhibits.

An exhibit displaying historical MLR information is provided in Exhibit 2 of the Supporting Exhibits. Loss ratios in the 'Actual' column have been calculated from data submitted in the most recent three-year MLR filing using the federally-prescribed MLR methodology without the credibility adjustment. Enrollment data in the 'Actual' column ties directly to the historical data included in Table 4 of the PA Actuarial Memorandum Exhibits. Loss ratios and enrollment data in the 'Pricing' columns are projected values taken from each calendar year's approved ACA rate filing.

As shown in Exhibit 2, many differences exist between the actual and pricing loss ratios due to the extremely low population that was covered under the captioned company during this timespan.

## Plan Product Info

## AV Metal Values

Metal values were determined using the final 2022 HHS AV Calculator.

## Membership Projections

Membership projections were developed based on our anticipated competitive positioning in the market combined with our current enrollment distribution by plan.

## Terminated Plans and Products

Please see Table 10 of the PA Actuarial Memorandum Exhibits for a mapping of all terminated SCIDs to a 2022 plan, where applicable.

## Warning Alerts

Several warning messages appear after clicking the validate button in the URRT. These messages highlight the fact that a terminated plan has entries of zero in the current enrollment and premium PMPM fields on worksheet 2 of the URRT. This particular plan was terminated prior to 2021 but has experience in 2020 and therefore must be included in the URRT.

## Effective Rate Review Information

The Pennsylvania Insurance Department is responsible for conducting effective rate review for all submitted rates.

## List of Supporting Exhibits

Supporting exhibits have been included with the rate filing to assist with the review process. Below is a list summarizing the contents of each exhibit.

- Exhibit 1: Derivation of Projection Period MLR
- Exhibit 2: Actual vs Pricing MLR \& Member Months
- Exhibit 3: Derivation of Age Calibration Factor
- Exhibit 4: Derivation of Geographical Calibration Factor
- Exhibit 5: Derivation of Annual Trend
- Exhibit 6: Derivation of Change in Network Factor
- Exhibit 7: Derivation of 3-child Cap Adjustment Factor
- Exhibit 8: Derivation of Change in Other Factor
- Exhibit 9: Derivation of Agent/Broker Fees and Commissions
- Exhibit 10: Enrollment Data from January - May 2021
- Exhibit 11: Historical Actual \& Projected Claims Data
- Exhibit 12: Historical \& Projected Financial Gains/Losses


## Actuarial Certification

I, , am a Member of the American Academy of Actuaries. I am currently a Manager in the Actuarial Services department for UPMC Health Plan. I certify that:

- 因ll factor, benefit and other changes from the prior approved filing have been disclosed in this actuarial memorandum.
- New plans cannot be considered modifications of existing plans under the uniform modification standards in 45 CFR 147.106.
- Whe information presented in the PA Actuarial Memorandum and PA Actuarial Memorandum Rate Exhibits is consistent with the information presented in the 2022 Rate Filing Justification.
- The projected Index Rate is:
a. In compliance with all applicable state and Federal statutes and regulations (45 CFR 156.80 and 147.102)
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
- The Index Rate and only the allowable modifiers as described in 45 CFR 156.80(d)(1) and 156.80(d)(2) were used to generate plan level rates.
- The geographic rating factors reflect only differences in the costs of delivery and do not include differences for population morbidity by geographic area.
- The AV Calculator was used to determine the AV Metal Values shown in Worksheet 2 of the Part I URRT for all plans except those specified in the certification.









| 62560 PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 39 | 544.09 | 557.69 |
| :---: | :---: | :---: | :---: | :---: |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 40 | 550.98 | 564.76 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 41 | 561.33 | 575.36 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 42 | 571.25 | 585.53 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 43 | 585.04 | 599.67 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 44 | 602.29 | 617.35 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 45 | 622.55 | 638.12 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 46 | 646.70 | 662.86 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 47 | 673.86 | 690.70 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 48 | 704.90 | 722.52 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 49 | 735.51 | 753.90 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 50 | 770.00 | 789.25 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 51 | 804.06 | 824.16 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 52 | 841.57 | 862.60 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 53 | 879.51 | 901.49 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 54 | 920.46 | 943.47 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 55 | 961.42 | 985.46 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 56 | 1005.83 | 1030.97 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 57 | 1050.66 | 1076.93 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 58 | 1098.52 | 1125.98 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 59 | 1122.23 | 1150.29 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 60 | 1170.09 | 1199.34 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 61 | 1211.48 | 1241.76 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 62 | 1238.64 | 1269.60 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 63 | 1272.70 | 1304.51 |
| 62560PA0010126 Rating Area 5 | Tobacco User/Non-Tobacco User | 64 and over | 1293.39 | 1325.72 |

## Exhibit 1: Derivation of Projection Period MLR

| Projected Paid <br> Claims | Projected Net <br> Amount of Risk <br> Adjustment | Projected Quality <br> Improvement <br> Initiatives |  <br> Fees | Projected Premium | Loss Ratio |
| :---: | :---: | :---: | :---: | :---: | :---: |
| $\$ 18,657,286.02$ | $\$(677,153.17)$ | $\$$ | $159,624.00$ | $\$$ | $16,677.94$ |

Exhibit 2: Actual vs Pricing MLR \& Member Months

|  | MLR |  | Member Months |  |
| :---: | :---: | :---: | :---: | :---: |
| Calendar <br> Year | Actual | Pricing | Actual | Pricing |
| 2017 | $66.3 \%$ | $83.8 \%$ | 37 | 84 |
| 2018 | $73.3 \%$ | $90.1 \%$ | 36 | 36 |
| 2019 | $101.4 \%$ | $86.8 \%$ | 36 | 36 |

## Exhibit 3: Derivation of Age Calibration Factor

| Age Band | Age Factor | Current/Projected Enrollment Distribution |
| :---: | :---: | :---: |
| 0-14 | 0.765 | 5.49\% |
| 15 | 0.833 | 0.46\% |
| 16 | 0.859 | 0.50\% |
| 17 | 0.885 | 0.52\% |
| 18 | 0.913 | 0.54\% |
| 19 | 0.941 | 0.74\% |
| 20 | 0.970 | 0.91\% |
| 21 | 1.000 | 0.93\% |
| 22 | 1.000 | 1.05\% |
| 23 | 1.000 | 0.87\% |
| 24 | 1.000 | 0.76\% |
| 25 | 1.004 | 0.79\% |
| 26 | 1.024 | 1.28\% |
| 27 | 1.048 | 1.37\% |
| 28 | 1.087 | 1.48\% |
| 29 | 1.119 | 1.44\% |
| 30 | 1.135 | 1.56\% |
| 31 | 1.159 | 1.51\% |
| 32 | 1.183 | 1.47\% |
| 33 | 1.198 | 1.43\% |
| 34 | 1.214 | 1.38\% |
| 35 | 1.222 | 1.39\% |
| 36 | 1.23 | 1.45\% |
| 37 | 1.238 | 1.39\% |
| 38 | 1.246 | 1.41\% |
| 39 | 1.262 | 1.41\% |
| 40 | 1.278 | 1.47\% |
| 41 | 1.302 | 1.43\% |
| 42 | 1.325 | 1.42\% |
| 43 | 1.357 | 1.45\% |
| 44 | 1.397 | 1.35\% |
| 45 | 1.444 | 1.40\% |
| 46 | 1.5 | 1.45\% |
| 47 | 1.563 | 1.51\% |
| 48 | 1.635 | 1.56\% |
| 49 | 1.706 | 1.68\% |
| 50 | 1.786 | 2.03\% |
| 51 | 1.865 | 1.97\% |
| 52 | 1.952 | 2.04\% |
| 53 | 2.04 | 2.18\% |
| 54 | 2.135 | 2.25\% |
| 55 | 2.23 | 2.53\% |
| 56 | 2.333 | 2.78\% |
| 57 | 2.437 | 2.91\% |
| 58 | 2.548 | 3.10\% |
| 59 | 2.603 | 3.45\% |
| 60 | 2.714 | 3.95\% |
| 61 | 2.81 | 4.22\% |
| 62 | 2.873 | 5.13\% |
| 63 | 2.952 | 6.01\% |
| 64 and over | 3 | 7.20\% |

[^3]Exhibit 4: Derivation of Geographical Calibration Factor

| Rating Areas | Portion of <br> Projected Enrl | Proposed Factor |
| :--- | ---: | ---: |
| 1 | $44.14 \%$ | 0.966 |
| 2 | $0.00 \%$ | 1.165 |
| 3 | $0.00 \%$ | 1.280 |
| 4 | $0.00 \%$ | 0.966 |
| 5 | $55.86 \%$ | 0.966 |
| 6 | $0.00 \%$ | 1.431 |
| 7 | $0.00 \%$ | 1.455 |
| 9 | $0.00 \%$ | 1.274 |


| Calibration <br> Factor |
| ---: |
| 0.966 |

## Exhibit 5: Derivation of Annual Trend

Entire ACA-compliant Individual Block

## Base Data

|  | Inpatient Hospital |  |  |  |  |
| :--- | ---: | ---: | ---: | ---: | :---: |
| YEAR | ALLOWED AMT | ADMIT CNT | ENROLLMENT | Unit Cost | UTILIZATION <br> PTPM |
| 2019 | $\$ 167,467,911$ | 9,036 | $\mathbf{1 , 5 6 1 , 9 6 8}$ | $\$ 18,533.41$ | 69.4 |
| 2020 | $\$ 169,938,605$ | 8,393 | $\mathbf{1 , 4 4 0 , 4 5 8}$ | $\$ 20,248.11$ | 69.9 |


|  | Outpatient Hospital |  |  |  |  |
| :--- | ---: | ---: | ---: | ---: | ---: |
| YEAR | ALLOWED AMT | SERVICE CNT | ENROLLMENT | Unit Cost | UTILIZATION <br> PTPM |
| 2019 | $\$ 210,424,467$ | 525,916 | $\mathbf{1 , 5 6 1 , 9 6 8}$ | $\$ 400.11$ | $4,040.4$ |
| 2020 | $\$ 204,718,773$ | 489,135 | $\mathbf{1 , 4 4 0 , 4 5 8}$ | $\$ 418.53$ | $4,074.8$ |

Professional

| YEAR | ALLOWED AMT | SERVICE CNT | ENROLLMENT | Unit Cost | UTILIZATION <br> ADMIT PTPM |
| ---: | ---: | ---: | ---: | :---: | :---: |
| 2019 | $\$ 141,055,674$ | $1,653,302$ | $\mathbf{1 , 5 6 1 , 9 6 8}$ | $\$ 85.32$ | $12,701.7$ |
| 2020 | $\$ 131,694,216$ | $1,517,275$ | $\mathbf{1 , 4 4 0 , 4 5 8}$ | $\$ 86.80$ | $12,639.9$ |


|  |  |  |  | Other Medical |  |
| :--- | ---: | ---: | ---: | ---: | :---: |
| YEAR | ALLOWED AMT | SERVICE CNT | ENROLLMENT | Unit Cost | PTIZATION <br> PTPM |
| 2019 | $\$ 100,957,696$ | 57,663 | $\mathbf{1 , 5 6 1 , 9 6 8}$ | $\$ 1,750.82$ | 443.0 |
| 2020 | $\$ 97,749,461$ | 51,385 | $\mathbf{1 , 4 4 0 , 4 5 8}$ | $\$ 1,902.30$ | 428.1 |

Prescription Drugs

| YEAR | ALLOWED AMT | Prescriptions | ENROLLMENT | Unit Cost | UTILIZATION <br> PTPM |
| :---: | ---: | ---: | ---: | :---: | :---: |
| 2019 | $\$ 162,348,955$ | $1,582,336$ | $\mathbf{1 , 5 6 1 , 9 6 8}$ | $\$ 102.60$ | $12,156.5$ |
| 2020 | $\$ 161,881,315$ | $1,404,421$ | $\mathbf{1 , 4 4 0 , 4 5 8}$ | $\$ 115.27$ | $11,699.8$ |

Pediatric Dental


## Trend Output

| Service Category | 2020 Allowed Amt | Weight | Cost | Utilization | Overall |
| :--- | ---: | ---: | ---: | ---: | ---: |
| Inpatient Hospital | $\$ 169,938,605$ | $22.1 \%$ | $9.25 \%$ | $0.72 \%$ | $10.04 \%$ |
| Outpatient Hospital | $\$ 204,718,773$ | $26.7 \%$ | $4.60 \%$ | $0.85 \%$ | $5.50 \%$ |
| Professional | $\$ 131,694,216$ | $17.2 \%$ | $1.73 \%$ | $-0.49 \%$ | $1.24 \%$ |
| Other Medical | $\$ 99,434,754$ | $13.0 \%$ | $8.65 \%$ | $-3.37 \%$ | $4.99 \%$ |
| Capitation | $\$ 0$ | $0.0 \%$ | $0.00 \%$ | $0.00 \%$ | $0.00 \%$ |
| Prescription Drugs | $\$ 161,881,315$ | $21.1 \%$ | $12.34 \%$ | $-3.76 \%$ | $8.12 \%$ |

Exhibit 6: Derivation of Change in Network Factor

| Legal Entity | Average <br> Network <br> Factor | Induced <br> Demand <br> Factor | Network <br> Normalization <br> Factor | Network/Service <br> Area Factor | Average <br> Geographic <br> Factor | Portion of <br> Projected <br> Enrollment | Change in <br> Network <br> Factor |
| :--- | :---: | ---: | ---: | ---: | ---: | ---: | ---: |
| Health Coverage | 1.155 | 1.077 | 1.070 | 1.331 | 0.965 | $\mathbf{1 . 2 8 5}$ | $\mathbf{1 . 2 8 5}$ |
| Health Options | 0.864 | 1.073 | 1.070 | 0.991 | 1.001 | 0.92 |  |

Exhibit 7: Derivation of 3-child Cap Adjustment Factor

| Total Members | Dependents <br> under the age of <br> 21 in excess of 3 <br> per contract | \% of Total | 3-child Cap <br> Adjustment |
| ---: | ---: | ---: | ---: |
| 113,098 | 294 | $0.260 \%$ | $\mathbf{0 . 9 9 7}$ |

UPMC Feburary 2021 Individual Population including all legal entities

## Exhibit 10: Enrollment Data from January - June 2021

| Month | On Exch APTC Members | On Exch non-APTC Members | Off Exchange Members | Total |
| ---: | :---: | :---: | :---: | :---: |
| $2021 / 01$ | 2,126 | 195 | 613 | 2,934 |
| $2021 / 02$ | 2,129 | 205 | 597 | 2,931 |
| $2021 / 03$ | 2,102 | 193 | 589 | 2,884 |
| $2021 / 04$ | 2,082 | 204 | 583 | 2,869 |
| $2021 / 05$ | 2,091 | 204 | 575 | 2,870 |
| $2021 / 06$ | 2,151 | 158 | 558 | 2,867 |

## Exhibit 11: Historical Actual \& Projected Claims Data

| Year | Projected Paid Claims PMPM | Actual Paid Claims PMPM |  |
| :---: | :--- | ---: | :--- |
| 2017 | $\$$ | 294.94 | $\$$ |
| 2018 | $\$$ | 312.36 | $\$$ |
| 2019 | $\$$ | 323.37 | $\$$ |
| 2020 | $\$$ | 294.20 | $\$$ |

Exhibit 12: Historical \& Projected Financial Gains/Losses

| Year | Total Member Months | Total Administrative Expenses | Total Incurred Claims | Total Paid Taxes and Fees | Total Premium | Profit | Annual Underwriting Gain/Loss | Underwriting Gain/Loss PMPM |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 2016 | 75 | (\$917) | \$470 | \$0 | \$18,322 | \$18,769 | \$17,852 | \$238.03 |
| 2017 | 37 | \$0 | \$618 | \$0 | \$9,809 | \$9,191 | \$9,191 | \$248.40 |
| 2018 | 36 | \$749 | \$325 | \$0 | \$9,179 | \$8,105 | \$8,854 | \$245.93 |
| 2019 | 36 | \$7,071 | \$2,903 | \$781 | \$10,746 | (\$10) | \$7,843 | \$217.85 |
| 2020 | 36 | \$1,957 | \$162 | \$409 | \$10,915 | \$8,387 | \$10,753 | \$298.68 |
| 2021 | 41,400 | \$3,071,929 | \$20,374,434 | \$18,664 | \$26,681,125 | \$533,622 | \$6,306,690 | \$152.34 |
| 2022 | 35,472 | \$2,274,572 | \$19,937,072 | \$16,678 | \$24,132,193 | \$0 | \$4,195,121 | \$118.27 |

2022 Business Rules Template v11.0 All fields with an asterisk (*) are required. To validate the template, press Validate button or Ctrl + Shift + I. To finalize the template, press Finalize button or Ctrl + Shift + F

| 2022 Business Rules Template v11.0 |  | fields with a | required. To validate the templa | ate, press Validate bution | Ctr + Shit + I. To finalize | template, press Finaliz | uton or Cirr + Shitt + F. |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Enter the Issuer Rule on the first row (no Product ID or Plan ID). |  |  |  |  |  |
|  |  | For each Product rule, enter only the Product ID and the business rules that differ from the Issuer Rule. |  |  |  |  |  |
|  |  | For each Plan rule, enter only the Plan ID and the business rules that differ from the Product or Issuer Rule. |  |  |  |  |  |
|  |  | Issuer level rule will apply only to plan type indicated in cell C10. |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| HIOS Issuer ID*Medical, Dental, or Both?* | 62560 |  |  |  |  |  |  |
|  | Medical |  |  |  |  |  |  |
| Product ID | Plan ID(Standard Component) | Medical or Dental Rule?* | What is the maximum number of rated underage dependents on this policy? | Is there a maximum age for a dependent? | How is age determined for rating and eligibility purposes? | How is tobacco status determined for subscribers and dependents? | What relationships between primary and dependent are allowed, and is the dependent required to live in the same household as the primary subscriber? |
|  |  |  |  |  |  |  |  |

Dear Mike Lovely:

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 June 22, 2021. If you have any questions or difficulties in providing the data within this time frame, please call me.

The following questions are from Oliver Wyman, our Actuarial Consultant:

No consultant questions.

## Additional Carrier Enrollment Questions

1. For each month between January 2021 and the most recent date available (e.g., June 11, 2021), please provide the average count of Individual ACA enrollment, split by On-Exchange APTC, On-Exchange nonAPTC, and Off-Exchange members. Please provide the enrollment data for each available month separately.

Please see Exhibit 10 of the Supporting Exhibits for the requested enrollment breakout from January - May 2021.
2. For the On-Exchange non-APTC members who are currently enrolled as of the most recent date available, please specify the percentage of those individuals that you expect will enroll through the Exchange in 2022 and take advantage of the enhanced and expanded subsidies as a result of ARPA.
3. For the Off-Exchange members who are currently enrolled as of the most recent date available, please specify the percentage of those individuals that you expect will enroll through the Exchange in 2022 and take advantage of the enhanced and expanded subsidies as a result of ARPA.

## (Bundled response for questions 2 \& 3): We do not have income levels for this population.

 Without this vital piece of information, it is difficult for us to estimate how many of them could be impacted by this change. Pennie, with presumably a better look at the relevant data, has estimated $\mathbf{5 0 \%}$ could now be eligible. Given that estimate, we have been implementing a heavy outreach to the population to ensure as many as possible take advantage of the situation. Just like with all ARPA changes that bring advantages to members, the key dependency will be the ability to engage that population.The following are additional questions or comments from the PID:

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

We can confirm that we have tested to ensure that the rates match.
2. Please provide an exhibit that quantitatively shows a comparison of the actual to projected claim cost PMPMs for calendar years 2017-2020, as applicable.

## Please see Exhibit 11 of the Supporting Exhibits for a comparison of the actual and projected claims costs over the 2017-2020 timespan.

Please be advised that there may be additional questions based on the responses to the above. However, it is our hope to avoid 3rd round data calls. Towards this end, please provide complete detailed and thorough responses including supporting data and narrative.

Each response to a Department data call must contain a cover letter that details the changes made to the PA Actuarial Memorandum Exhibits and the reasons why the changes were made, e.g., in response to Department question number 5.

Response to this request should be provided via SERFF in Microsoft Excel spreadsheets. Please retain all formulas.

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) 783-2117 or email at jlaverty@pa.gov.

Sincerely,

James Laverty, FSA, MAAA
Actuary
Bureau of Accident \& Health Insurance
Cell (860) 729-8522

Conclusion:
Sincerely,
Jim Laverty

Dear Mike Lovely:

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 July 13, 2021. If you have any questions or difficulties in providing the data within this time frame, please call me.

The following questions are from Oliver Wyman, our Actuarial Consultant:

No consultant questions.

Additional Carrier Enrollment Questions

These questions were asked during Round 1. Please indicate if you have any updated information regarding these three enrollment questions.

1. For each month between January 2021 and the most recent date available (e.g., June 11, 2021), please provide the average count of Individual ACA enrollment, split by On-Exchange APTC, On-Exchange nonAPTC, and Off-Exchange members. Please provide the enrollment data for each available month separately.

We do not currently have any updated information for this particular breakout. We can provide an updated exhibit as an amendment in SERFF once the detail we require becomes available.
2. For the On-Exchange non-APTC members who are currently enrolled as of the most recent date available, please specify the percentage of those individuals that you expect will enroll through the Exchange in 2022 and take advantage of the enhanced and expanded subsidies as a result of ARPA.

## Our stance on this has not changed from the response provided during the first round of correspondence.

3. For the Off-Exchange members who are currently enrolled as of the most recent date available, please specify the percentage of those individuals that you expect will enroll through the Exchange in 2022 and take advantage of the enhanced and expanded subsidies as a result of ARPA.

# Our stance on this has not changed from the response provided during the first round of correspondence. 

The following are additional questions or comments from the PID:

1. Please provide an exhibit showing the actual experience for calendar years 2016-2020 and the projection experience for 2021 and 2022 for the following categories: Member Months, Total Administrative Expenses, Total Incurred Claims, Total Premium, Total Actual Paid Taxes and Fees, Profit, Total Underwriting Gain/Loss and Underwriting Gain/Loss PMPM

## Please see Exhibit 12 of the Supporting Exhibits for the requested breakout.

2. Does this company have any transitional membership? If so, has there recently been a significant drop in transitional membership? Do you anticipate a drop in 2022?

This company does not have transitional membership.
3. In the PAAM Exhibits, II.a.Reins Table - Exp tab, please update the Coinsurance Rate, in cell E5, to 40\%. 4. Please provide a list of any assumptions that have changed because of the change in the coinsurance rate and explain why.
5. Please be aware that the final coinsurance parameter will be communicated on Friday, July 16th. Then, the revised exhibits and rates will be due on Tuesday, July 20th.
(Bundled response for questions 3, 4, and 5) We have updated the coinsurance rate in cell E5 of the II.a.Reins Table - Exp tab of the PAAM Exhibits to be $45 \%$. No changes to assumptions were made due to this change.
6. If the projected risk adjustment transfer amount in Table 5 will be modified, due to the final CMS transfer amount published on June 30th, please provide narrative and detailed supporting data to justify the proposed changes.

## We have changed the projected risk adjustment transfer amount in Table 5 to match the final 2020 transfer amount provided by CMS. This change resulted in a favorable restatement of projected risk adjustment of $\mathbf{\$ 0 . 0 3}$ PMPM.

7. 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, and Federal Rate Templates are identical.

We can confirm that we have tested to ensure that the rates match.
8. Please ensure that the $7 / 13 / 21$ versions of the following items are posted in SERFF with your July 13 th response to this data call.
a. Cover Letter identifying all changes made and the reasons for the change. Also, show the revised rate change.
b. PA Actuarial Memorandum
c. PA Actuarial Memorandum Exhibits
d. Department's Plan Design Summary and Rate Template Exhibits (please ensure that the rate template by county is populated with only numeric values - no "NA"
e. URRT
f. Federal Rate Template
g. Part III: Actuarial Memorandum
h. Updated Rate Change Request Summary (Attachment I)
i. Public PDF with limited redactions as previously directed in the Guidance (includes all correspondence and supporting exhibits after the initial submission, in addition to all the above items).

Please be advised that there may be additional questions based on the responses to the above. However, it is our hope to avoid 3rd round data calls. Towards this end, please provide complete detailed and thorough responses including supporting data and narrative.

Each response to a Department data call must contain a cover letter that details the changes made to the PA Actuarial Memorandum Exhibits and the reasons why the changes were made, e.g., in response to Department question number 5.

Response to this request should be provided via SERFF in Microsoft Excel spreadsheets. Please retain all formulas.

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) 783-2117 or email at jlaverty@pa.gov.

Sincerely,

James Laverty, FSA, MAAA
Actuary
Bureau of Accident \& Health Insurance
Cell (860) 729-8522

Conclusion:
Sincerely,
Jim Laverty

## 2021 Service Area

Issuer: UPMC Health Coverage, Inc. Market: Individual and Family


[^4]
## 2022 Service Area

Issuer: UPMC Health Coverage, Inc.
Market: Individual and Family


[^5]
[^0]:    ${ }^{1}$ 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.

[^1]:    "Expess Prescription Orug Rebotes as s negative number

[^2]:    *structure of Table 10 leads to DIV/0 error in cell AC15 for 2021 filing

[^3]:    Initial Age Factor:
    1.900 3-child cap Adjustment:
    Final Age Factor used: 1.895

[^4]:    Key (modify as needed)
    : On-exchange service area
    $\triangle$ : Off-exchange service area

[^5]:    Key (modify as needed)
    : On-exchange service area
    $\mathbf{\Delta}$ : Off-exchange service area

