

Part III Actuarial Memorandum

Version 1

Priority Health

Individual Rate Filing

Effective January 1, 2022

PRHL-132852620

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Part III Actuarial Memorandum
Priority Health
Individual Rate Filing
Effective January 1, 2022

INTRODUCTION

Priority Health (PH) is proposing revised benefits and rates for 2022.

Significantly, the following items have been updated:

- The base experience has been updated from 2019 to 2020.
- Medical and Rx annual trend factors.
- Adjustments for COVID-19 in the 2020 experience period and impact to utilization and cost.
- The Benefit Relative Values are being updated for trend leveraging and benefit changes.
- Underlying assumptions for population risk morbidity.
- Underlying assumptions for the risk adjustment program.
- Underlying assumptions for admin, taxes and fees.

Actual vs. Expected Results

The rates developed by this filing are expected to produce an aggregate Benefit Ratio as shown on Exhibit 1. Plan management should actively monitor the developing experience for indications that the underlying assumptions of this filing are not developing as anticipated. Deviations from the priced for margin may be caused by fluctuations in medical trend, administrative expenses being higher or lower than target, membership failing to reach targeted levels, changes in the regulatory environment, or other causes.

Note

This rate development and memorandum is based on the applicable requirements under the current federal and state regulations, and that they continue. If there are any regulatory, legislative or judicial changes to current requirements, there could be a material impact on PH's business and proposed rates and actuarial assumptions used to develop those rates may no longer be appropriate.

I. GENERAL INFORMATION

A. Company Information

Company Legal Name: Priority Health

HIOS Issuer ID: 29698

NAIC Number: 95561

Market: Individual

Effective Date: January 1, 2022

B. Company Contact Information

Primary Contact Name: Kim Zondervan

Primary Contact Telephone Number: 616-464-0194

Primary Contact Address: 1239 E. Beltline NE, MS 2345, Grand Rapids, MI 49525

Primary Contact Email Address: kimberly.zondervan@priorityhealth.com

C. Review Requested: Review and approval of rates for existing and new products.

D. Brief Description of Benefits: Priority Health is proposing one product type, HMO. Two types of benefit plans are being offered, HSA and non-HSA. Both plan types include coverage for all EHBs. The Plan and Benefit template has additional detail on the plan designs.

E. Effective Date and SERFF Tracking Number of Prior Filing:

PH Individual plans PRHL-132382678. This filing had an effective date of 1/1/2021. The 2021 binder number was SERFF Tracking Num: PRHL-MI21-125099255.

F. Scope and Purpose of the Filing:

The purpose of this memorandum is to document and describe the proposed rating for 2022 ACA Individual products. This memorandum is intended to be used only by the Michigan Department of Insurance and Financial Services (DIFS) and plan management in their review of the proposed rating. Other uses may not be appropriate and should take into account the entire memorandum and attached exhibits. The information in this memorandum supports the attached Unified Rate Review Template, the Rate Manual, and the attached rates.

G. Components of this Rate Filing:

- Priority Health Rate Manual
- Michigan Rate Review Checklist
- URRT Template
- Actuarial Memorandum and Certification with Exhibits
- Rate Template
- Autism Attestation
- Supplemental Health Care Exhibit

The rate change proposed by this filing is not greater than 15% for any plans. Therefore, a Part II Justification of the Rate Increase is not required.

II. PROPOSED RATE INCREASE(S)

The proposed rate changes and projected membership and premium amounts are shown by plan on Worksheet 2 of the URRT in the applicable line item.

The reasons for the rate change include:

- Updated experience upon which the rates are based, including an adjustment for the COVID-19 impact on the experience period.

- Updated medical and prescription Rx cost and utilization trends.
- Updated benefit relative values, which may cause variation in rate changes by plan.
- Prospective benefit adjustments to existing products; the benefit relative values have been updated, which may cause variation in rate changes by plan.
- Re-evaluation of the anticipated morbidity adjustment to the rating base.
- Anticipated changes in the payments to the Federal Risk Adjustment program.
- Updated factors for administrative expenses and margin. With this filing, the margin varies by plan.
- Updated taxes and fees for 2022.

The overall average annual increase which will be experienced by members over January 1, 2021 filed rates is a 3.86% increase.

Projected Average Annual 2022 Premium per Member with proposed increase	\$5,926
Projected Average Annual 2022 Premium per Member without proposed increase	\$5,706

III. MARKET EXPERIENCE

The experience used to complete the URRT Worksheet 1 Experience Period section is for all Priority Health individual plans in effect during 2020. The experience includes a blend of HSA and non-HSA benefit plans. As has been described above, this experience has been adjusted to be appropriate for the Individual market in 2021. We have included an adjustment for the anticipated shift from Total Health Care membership through the Risk Pool Adjustment described below. This shift in membership is due to an integration of that block of business into Priority Health.

IV. EXPERIENCE PERIOD PREMIUM AND CLAIMS

The experience shown in the URRT Worksheet 1 is for 2020 Individual, non-grandfathered plans. The experience includes a blend of HSA and non-HSA plans.

A. Dates of Service for the Experience Period: January 1, 2020 through December 31, 2020.

B. Date Through Which Claims Were Paid: February 28, 2021

C. Current Enrollment and Premium listed on Worksheet 2 is based on members as of April 30, 2021.

D. Premiums in Experience Period: The premium amounts were taken from Priority Health's data warehouse. The premiums shown have been adjusted to reconcile with company financial statements. The premiums include premium credits that were given to groups in 2020. Based on federal requirements, we are not expecting to have MLR rebate.

E. Allowed and Incurred Claims Incurred During the Experience Period: The Allowed Claims and the Incurred Claims shown come from a combination of sources:

- 1) The medical claim records in the Priority Health data warehouse. Each claim record carries an allowed amount in addition to the Incurred (paid) amount and member cost shares. These amounts were directly used.
- 2) Capitation claim records in the data warehouse. The Fee-For-Service allowed equivalent was used for both allowed and incurred claims.
- 3) The Rx claim records in the data warehouse. These records carry both an allowed and an incurred (paid) amount. This amount does include dispensing fees and is before the impact of Rx rebates.
- 4) Manual adjustments are made for non-system claims payments. These adjustments are made for provider settlements, provider incentive programs, and Rx rebates.

F. Incurred But Not Paid Claims: Claims were completed using the Priority Health claim reserve model. Monthly completion factors are developed for Inpatient, Outpatient, Professional, Injectable, and Rx claims. For each service category, a four-year history of claims and membership is used. A 12-month chain ladder method, with high and low months discarded, is used. For the most recent months, other analyses, such as the projection method, are also used to develop the IBNR estimate.

V. BENEFIT CATEGORIES

Medical claims, including capitated services, have been categorized using the Milliman Health Cost Guidelines Grouper™ Model. The Capitation category requires additional amounts to recognize non-system payments and adjustments. These additional amounts are found by reconciliation with financial statements.

The Other category includes injectable drugs. The measurement unit for these categories is “services”.

VI. PROJECTION FACTORS

Section II of the URRT Page 1 shows the development of the expected claims cost from which the Index Rate will be determined. Exhibit 2.1 shows this same calculation in more detail. Each section of the build-up is described below.

Section 0 Base Experience

This section shows actual experience which has been completed for IBNR.

Section 1 Changes in Morbidity of Population Insured

Adjustments were made for the provisions of ACA and changes in our benefit offerings and expected mix of members.

Risk Pool Adjustment: An adjustment was made for an anticipated difference in the risk morbidity for ACA plans based on both average risk factors and the change in the age mix of membership. Exhibit 3 shows the development of this factor. The final factor, 0.986 or -1.4%, is (Column C * Column D) on the exhibit.

The formula for ACA Risk Adjustment and individual experience were used to develop this factor as follows.

- Member months from the 2019 experience were divided into categories depending on the type of product they have in early 2021.

- A risk score was calculated for each category. These scores are shown in column A and the weighted average is shown in line 10. This was compared to the 2019 segment totals in line 11 for the factor that is shown in Column C.
- An allowable rating factor (ARF) was also developed for each of these categories to show the change in age for the population and is shown in Column B with the weighted average is shown in line 10. The inverse of this compared to the 2019 totals in line 11 is shown in column D.
- These adjustments reflect the migration into the ACA pool from other segments of the population and new members, including the integration of Total Health Care members into the Priority Health block, and new members.

COVID-19 Experience Adjustment

An adjustment has been developed for the impact of COVID-19 on 2020 experience. Exhibit 11 shows the development of this factor. We have used 2019 experience trended forward to 2020 and compared the experience to the actual 2020 experience. This adjustment applied to the 2020 experience gives an appropriate base for the development of 2022 rates. Pharmacy in 2020 was considered not impacted by COVID-19 and is based on actual 2020 experience trend over 2019. Note that with this methodology, we did not normalize for other factors, but instead developed them based on 2019 experience so that the mix change in 2020 was not an impact in the adjustments being used. Per DIFS guidance, this is shown on Worksheet 1 of the URRT in the “Other” adjustment line.

COVID-19 Prospective Adjustment

We have not included an impact to COVID-19 outside of what is noted above and as described in the trend section to adjust for the 2020 experience. At this time, we do not anticipate a material impact on 2022 due to COVID-19. We do not have a load with the continued uncertainty around COVID-19 prospectively and lack of data for estimates of what is expected to happen.

Other: An additional adjustment was made to normalize for the narrow network experience due to the different network contracts and geographic distribution compared to expected in the experience period.

Section 2 Other Changes:

There are no other adjustments required which did not fit into Section 1.

Additional benefits required for the EHB package / Plan Design Changes

- None.

Changes in Demographics

No adjustment was made outside of the Risk Pool Adjustment, described above, for the change in demographics. The demographics in the population have been very steady during the experience period. Note that with the integration of Total Health Care members, we have used the Risk Pool Adjustment for differences in that population.

Sections 3 and 4 Trend:

The trends used by Priority Health are based on an analysis of Priority Health Commercial Group experience and our best estimate of future trends. Experience for all group sizes has been used to develop these trends. Updated trend data has been provided for our HMO and POS medical business. The updated Rx trend data also includes our PPO business. A summary of the new allowed charges trends is shown in Exhibit 4.

Medical Trend Analysis

This section describes Priority's normal trend development. Note that the COVID-19 pandemic has forced us to modify these procedures. The modifications will be described below.

Allowed charges are used as the starting point for trend development. Historical allowed charge trends are analyzed by reviewing monthly and twelve-month rolling average of unit cost and utilization data. This data was then used to produce regression analyses for the historical unit cost and utilization component trends. Estimates of future cost trends are based on discussions with our Provider Contracting area as well as reviewing the historical experience.

The historical experience is reviewed, and from this data, cost and utilization components are chosen for the pricing trends. The pick for each utilization component is based on a consideration of the experience, expected future trends, and a review of the demographics of the group business. The demographics are stable, so there was no adjustment for this.

The pick for each cost component is based on consideration of the historical experience, estimates provided by the provider contracting staff and estimates of the impact of future medical management activities. The final PMPM trends shown are calculated from the components.

Normalization of Medical Trend for COVID-19

The experience period for the pricing projection, 2020, was heavily impacted by the COVID-19 pandemic. As mentioned in the Introduction and shown on Exhibit 11, normalization adjustments have been made to the experience used in the pricing projection. The trend development has also been normalized in a complementary fashion.

- In the analysis of historical trends, the experience from March 2020 and later was not used.
- In this rate development, the midpoint-to-midpoint trending period is July 1, 2020 through June 30, 2022.
- In our usual approach, we would model the trending period using actual trends for the portion of time for which we have actual data. In this filing, that would be July through December 2020.
- In our normalized approach, we have substituted long term, pre-COVID-19 trends for this portion of the trending period.
- Long term, pre-COVID-19 trends are also used to model the rest of the trending period.

Rx Trend Analysis

To develop the Rx trends, twelve month rolling unit cost and utilization data was used to produce regression analysis for the unit cost and utilization components. This analysis was then supplemented with expected price increases from our pharmacy director, industry data, key cost features from our PBM contract, and a review of the demographics of the group business. After review of all the data, component trends for cost and utilization were chosen.

No normalization was done to the Rx Trend for COVID-19.

2022 Pricing Trend

The Medical and Pharmacy pricing trends used to develop the index rate for 2022 are shown on Exhibit 4.

VII. CREDIBILITY MANUAL RATE DEVELOPMENT

The Individual ACA experience is based on 1,048,723 member months. We deemed that to be fully credible. Therefore, no credibility manual was developed.

VIII. CREDIBILITY OF EXPERIENCE

The Individual ACA experience is based on 1,048,723 member months. We deemed that to be fully credible.

IX. PAID TO ALLOWED RATIO

The Paid to Allowed Average Factor in Projection Period in Section III of Worksheet I is based on the 2019 experience for Individual ACA business and the ratio of paid claims to allowed claims, adjusted through a normalization for the Cost Share Reduction load on silver on-marketplace plans and expected benefit level changes from 2019 to 2021. Since we do not normalize our COVID-19 adjustment for mix, it is appropriate to use the 2019 experience in how the Paid to Allowed Ratio is developed.

X. RISK ADJUSTMENT AND REINSURANCE

Experience Period Risk Adjustment and Reinsurance Adjustments PMPM:

The Risk Transfer Payment formula was used to estimate the extent to which the Priority Health individual experience has a higher or lower than average risk than the overall individual marketplace. Since this formula is based on a comparison of a plan's risk to the statewide market risk, assumptions were needed for the statewide base. These assumptions were based on competitor URRTs, competitor rate filing data, factors published with the Transfer Payment methodology, the 2019 Transfer Payment amounts, and the 2020 Interim Transfer Payment estimates. These assumptions were then used to produce a range of values for the Risk Transfer payment.

Projected Risk Adjustments PMPM:

The estimated 2020 Risk Adjustment accrual model described above was used as a base to project the 2022 Transfer Payment. Adjustments to the model were made for known risk changes in our 2021 block for members that left as well as for members that are new to individual business both from demographic information and prior experience as available from other blocks. In addition, we estimated

adjustments to the market average risk as well based on Priority Health expected market share and Priority Health risk pool changes.

Plan management has chosen to use the value from the modeling range of -\$53.00 PMPM. This assumption is equivalent to saying that PH members will have a PMPM cost which is \$53.00 lower than the market average, and that PH will therefore have a payable amount due to the transfer formula. This amount is then converted to a percentage factor shown on line 5a of Exhibit 2.1 by comparing it to the completed, trended allowed claims from the experience period, adjusted for the paid to allowed ratio to account for cost sharing. Note that the formula includes the impact of age, area and metal level selection as well as member morbidity.

The PMPM results for this were converted to a percentage of premium and Exhibits 2.1 and 2.2 illustrates how that flows through into our Projected Index Rate and Market Adjusted Index Rate.

The risk adjustment fee is equivalent to \$0.25 PMPM or \$3.00 annually. The source for this is the 2022 Notice of Benefit and Payment Parameters.

Projected ACA Reinsurance Recoveries Net of Reinsurance Premium:

The temporary ACA Reinsurance program ended in 2016 and therefore we have no projected recoveries or impact to premium assumed.

XI. NON-BENEFIT EXPENSES AND PROFIT & RISK

General Administrative expense load

To develop the general administrative expense load, we used budgeted administrative expense for the period January 1, 2021 through December 31, 2021. This base data represents projections for all functional areas within the company and aligns with our membership projections for this time period. We rolled the administrative budget forward taking into consideration expected growth to develop administrative cost estimates for the period January through December 31, 2022.

In the development of product level administrative loads, we review our entire portfolio of products and isolate administrative functions that are specific to a product or group of products. These costs are then allocated only to that specific product or group of products. For the Individual product this includes direct sales (internal and external), marketing and product administration. Those administrative costs that cannot be assigned to a product or group of products are reviewed and allocated to this product based on the best metric available.

Exhibit 5 shows a buildup of the administrative expense and supports an administrative load of \$28.75 PMPM.

Taxes and Fees – the following are included:

A. Michigan Department of Insurance and Financial Services Regulatory Fee: This represents an annual fee paid based on written premiums to fund the department expenses, including the cost of

examinations. We estimate the fee to be approximately 0.03% of premium in 2022 which is based on historical rate increases.

B. HHS Risk Adjustment User Fee: Carriers are assessed a fee to fund HHS's operation of the risk adjustment program. This fee is \$0.25 PMPM or \$3.00 annually as stated in the HHS Notice of Benefit and Payment Parameters for 2022.

C. Patient-Centered Outcomes Research Institute Fee: The fee will fund the Patient-Centered Outcomes Research Institute. This fee is \$2.66 PMPY for 2022.

D. Exchange User Fee: The carrier is assessed a fee equal to 2.75% of premium for each member that purchases insurance on the FFM marketplace. These fees are applied as an adjustment to the index rate at the market level to ensure consistency between premium rates both on and off the exchange. This adjustment is based on our estimated mix between on and off exchange membership. Overall, on and off the FFM, we estimate the fee to be approximately 2.3% with 85% of members on exchange.

E. Insurance Provider Assessment (IPA): the Michigan IPA assesses \$2.40 PMPM on all commercial fully insured members enrolled by the plan.

Profit/Risk Margin: The target profit/risk margin is 1.97% before FIT for all benefit plans in aggregate. The actual profit/risk margin varies by AV Metal Level as shown in the Rate Manual.

Commission: A 4.0% charge is made for average expected commissions. On Exhibit 2.1, commission is included with the administrative expense.

XII. INDEX RATE

The methodology used to develop the reported Index Rate of the Experience Period in Part I of the Unified Rate Review Template used our base experience for 2020 and added additional benefits that were not part of our experience period that are now part of the Essential Health Benefits package as well as adjusted for COVID-19 impact not expected to continue. This adjustment for COVID-19 is described above under section VI Projection Factors.

The index rate for the projection period was produced using Individual ACA claims experience from calendar year 2020, adjusted as described above in the Projection section. The experience period and index rates include allowed claims for essential health benefits on a PMPM basis.

There are no differences between the total allowed claims and the index rate.

To determine benefit plan premium rates, the projected index rate was adjusted, as allowed in 45 CFR 156.80(d), for network differences, age, area, benefit plan, and member smoking status. Please see the rate manual and Section XXII below, for additional information.

XIII. MARKET ADJUSTED INDEX RATE

The development of the Market Adjusted Index Rate is shown on Exhibit 2.2. The starting PMPM for this calculation comes from the blended PMPMs from lines 4h of Exhibit 2.1, the projected experience

PMPM. Note that no non-EHB have been included in the projection. Finally, adjustments are made for risk adjustment and exchange user fees.

XIV. PLAN ADJUSTED INDEX RATES

Plan Adjusted Index Rates are developed on Exhibit 2.3. In this calculation, the Market Adjusted Index rate is further adjusted for:

- Non-EHB benefits as shown in the Rate Manual
- Plan Benefits (The Benefit Relative Value or BRV) and Cost Sharing as shown in the Rate Manual
- Retention as shown in the Rate Manual
- Paid to Allowed Ratio as shown in the Rate Manual
- Network Factor as shown in the Rate Manual
- CSR Load only for Silver plans both on and off the exchange as shown in the Rate Manual

The resulting PMPM is shown both before and after the necessary calibration to use the required Age Factors, Smoker and Area factors. Please note that a Catastrophic Adjustment is Not Applicable.

XV. CALIBRATION

The Plan Adjusted Index Rates have been calibrated to the age factors. Exhibit 6 shows the calculations and describes the methodology used to calibrate the age factors. The BRVs used by the Plan are normalized to 1.000 during development. As a result, the Plan Adjusted Index Rates do not need to be calibrated to fit those factors. There are also calibration factors for Tobacco and Area. All calibration factors are shown in the Rate Manual as well as Exhibit 2.1, section 9.

XVI. CONSUMER ADJUSTED PREMIUM RATE DEVELOPMENT

The Consumer Adjusted Premium Rates are shown in the Rate Template. These premium rates may be calculated using the formula and factors shown in the Rate Manual. The development of the rating factors is described in more detail in Section XXII. Exhibit 2.3 also shows a comparison of the Consumer Adjusted Premium Rates, before age and area are applied, with the Plan Adjusted Index Rates.

XVII. PROJECTED LOSS RATIO

The Projected MLR was calculated using the formula required by 45 CFR §158.22. This formula is:

$$ACA\ MLR = \frac{Incurring\ claims + Risk\ Adjustment\ Payments + expenses\ for\ activities\ that\ improve\ health\ care\ quality}{Premiums\ less\ federal\ and\ state\ taxes\ and\ licensing\ and\ regulatory\ fees}$$

Exhibit 1 details the calculation.

XVIII. AV METAL VALUES

The Metal Level Actuarial Values are shown in Worksheet 2. Most of the benefit plans proposed are not 100% compatible with the AV Calculator, having minor benefit provisions that did not fit into the AV Calculator structure. The differences, however, are small. To ensure compliance with the Metal Level requirements, the two-step process shown in 45 CFR §156.135 (b)(3) was used to test the variances.

- The AV calculator was used to determine an AV for each proposed benefit plan for the plan provisions that fit within the calculator.

- Adjustments were developed for benefits with non-standard coinsurance, an Urgent Care copay different from other Office Visit copays, pediatric vision and copays per day, in addition to coinsurance.
- After applying all of the adjustments, the resulting adjusted “Test” AVs were then checked to see if they fell into the required AV ranges, which they did.

Some of adjustments change the result of the AV test. Exhibit 7 shows the values produced by the AV Calculator, the adjustment factors, and the adjusted AVs which have been used for each plan. These are the values that we have shown in the URRT as well.

The standalone AV calculator was used in the development and pricing of plan designs. In the Plan and Benefits Template, the AV is calculated using the calculator within the template. In some cases, the AVs from the two templates do not match. We have provided Unique Plan Justifications for the plans that fall out of the AV range in the Plan and Benefits Template before adjustments described above.

Please see Section XXIV for the required actuarial certification of the Actuarial Values.

XIX. MEMBERSHIP PROJECTIONS

The membership projections are best estimates developed by the Priority Health Product Development staff. The enrolment for 2020 and early 2021 were used as the starting point in developing these projections as well as expectations for membership in new plans and integration of Total Health Care members into the Priority Health block.

XX. TERMINATED PRODUCTS

Please see Exhibit 8 for a list of the terminated plans and mappings into current plans.

XXI. PLAN TYPE

The proposed plans are included in the selections shown in Worksheet 2, Section I of the Part I Unified Rate Review Template.

XXII. EFFECTIVE RATE REVIEW INFORMATION

Development of Premium Rates

The premium rates developed by Priority Health are intended to be compliant with 45 CFR §147.102 Fair Health Insurance Premiums. The rate manual for the proposed benefit plans is attached. The rate manual shows the formula used to calculate the rates, the various rating factors, and an example of how to calculate the rates. Each of the rating factors is described further below.

Rates are calculated on a member by member basis. Therefore, rates for a family contract are determined as the sum of the individual family member rates. The premiums for no more than the three oldest covered children will be taken into account when determining a family premium.

A. Starting Value

The starting value is the PMPM shown on Line 5d of Exhibit 2.1. This value is not calibrated for average age; the average age adjustment happens later in the Rate Manual formula. Exhibit 9.2 shows the starting value. Quarterly trend factors do not apply to Individual plans.

B. AV Pricing Values

The AV Pricing Values, also called Benefit Relative Values (BRVs), were developed by Priority Health actuarial staff using the Milliman Managed Care Rating Model® (MCRM) to model medical benefits and an internally developed Pharmacy model. These two tools were combined into one model that was then used to determine the BRV for each proposed plan. Where there is an integrated Medical and Rx deductible, the MCRM tool was used to estimate the impact of the integrated deductible.

Prior to setting up the MCRM, product development staff developed templates showing the major benefit features of the proposed plans. These templates were then used to calibrate the benefits in the MCRM. The model was further calibrated to the PMPM allowed level of our proposed plans.

The BRVs are compliant with 45 CFR §147.102. In particular, the MCRM model does not anticipate the health status, claims experience, industry, or length of coverage of the members which may enroll in a particular plan.

The model does consider benefit induced utilization. For example, for plans with office copays, the number of expected office visits is influenced by the amount of the copay. As a second example, the expected number of Rx scripts is adjusted based on the size of the required copay. For deductible/coinsurance plans, there is an aggregate utilization assumption based on the deductible amount.

Table 3b of the Rate Manual summarizes the results by benefit plan, showing the high-level benefit design, the Actuarial Value Metal Level, and the Actuarial Value Pricing Level (BRV). The Priority Health reference plan is based on the projected most popular plan design. The BRVs were then normalized to get back to 1.0.

C. Network Factor

A separate network factor is not needed. This factor is therefore set to 1.000.

D. Age Factors

Priority Health is using the CMS Standard Age Curve. This age curve has a 3:1 ratio for age rating.

E. Area Factors

Area factors have been developed for 15 of the 16 rating areas established by the State of Michigan, with no coverage offered in region 16. The area factors will remain the same as 2021. The area factors developed in 2021 are still appropriate to use, and due to the regional differences in the impact of COVID-19, the additional experience in 2020 does not represent expectations for 2022. Exhibit 9.1 summarizes these factors. The factors are also shown in Worksheet 3 of the URRT.

F. Benefit Factor

Please see the section above on AV Pricing Values for a description of these factors.

G. Tobacco-Use Factor

The factor for members who smoke varies by age and are shown in the rate manual. Priority Health does not have any credible data which could be used to develop Smoker rating factor. Therefore, these

factors are a best estimate based on information from a research paper based on the Milliman Medical Underwriting Guidelines, a report from e-Health on smoker factor in the market rates, and marketplace research. As directed by the instructions for the URRT, this factor is calibrated to 1.000. The smoker factors before calibration have not changed from 2021.

Priority Health offers tobacco cessation programs and intervention drugs at no cost to our members.

H. Retention Factors

The factors for administration, taxes and fees, and profit have been described in earlier section and are displayed in the Rate Manual. In the calculation of the rates, the retention factors are applied last so that the profit margin can vary by benefit.

XXIII. RELIANCE

I have relied on Nick Gates, Priority Health Controller, and Cindy Brink, Priority Health Director of Financial Reporting and Analysis, for the development of administrative expenses and projected loss ratios. The results of this work appear to be reasonable.

I have relied on the Priority Health Product Development staff for membership projections. These projections have been examined and appear reasonable.

I have relied on the Milliman Health Cost Guidelines grouper model and the Actuarial Team members to categorize claim experience into the categories required by the URRT template. The results of this model were examined and appear reasonable.

I have relied on the Milliman Managed Care Rating Model and the Actuarial Team members in the development of benefit relativity factors. The results of this model were examined and appeared reasonable.

XXIV. ACTUARIAL CERTIFICATION

I, Kimberly S. Zondervan, am a member of the American Academy of Actuaries and am qualified to make certifications regarding the development of health insurance premiums. I am employed as an Actuary with Priority Health. I hereby certify that to the best of my knowledge and belief:

1. That the projected index rate is:
 - a. In compliance with all applicable State and Federal Statutes and Regulations (45 CFR 156.80(d)(1)), and
 - b. Has been developed in compliance with the applicable Actuarial Standards of Practice, and
 - c. Is reasonable in relation to the benefits provided and the population anticipated to be covered, and
 - d. Is neither excessive nor deficient.

2. That the index rate and only the allowable modifiers as described in 45 CFR 156.80(d)(1) and 45 CFR 156.80(d)(2) were used to generate plan level rates.
3. That the percent of total premium that represents essential health benefits included in Worksheet 2, Sections III and IV were calculated in accordance with actuarial standards of practice.
4. That the AV Calculator was used to determine the AV Metal Values shown in Worksheet 2 of the Part I Unified Rate Review Template for all plans except those specified in the attached certification. The attached certification, as required by 45 CFR §156.135, identifies plans with Unique designs for which an alternative methodology was used.
5. That the geographic rating factors reflect only differences in the costs of delivery and do not include differences for population morbidity by geographic area.
6. Note that the URRT does not demonstrate the process used to develop the rates but represents information required by federal regulation to provide support for the review of rate increases, certification of Qualified Health Plans for Federally-facilitated Exchanges, and for certification that the Index Rate is developed in accordance with federal regulation and used consistently and only adjusted by the allowable modifiers.

Signature 

Date June 8, 2021

XXV. RATE CHANGE SUMMARY

As described in Section II, the URRT worksheet 2 compares the new rates with the old by plan, and shows the weighted average change across all plans.

The following changes to the rating factors.

- Age: None.
- Tobacco: None.
- Geographic: None.
- Familial Status: None.

XXVI. SERVICE AREAS

For 2015 through 2022 premium rates have been submitted for all regions except region P. Premium rates are being submitted for all regions where Priority Health intends to sell new business. In 2022, some plans will only be offered in some of the regions where Priority Health sells business.

XXVII. AUTISM REQUIREMENT

The rate development process does not include an adjustment for autism benefits. Rather, the cost of this benefit is contained in the experience period claims. Since PH is including the cost of Autism claims in its rate development, the Autism fund will not be utilized.

An attestation stating compliance with Order No. 14-017-M is included with this filing.

XXIII. SUPPLEMENTAL HEALTH CARE EXHIBIT (SHCE)

The SHCE exhibit filed for 2020 is included with this filing. Exhibit 10 shows a reconciliation of this exhibit to the Experience Period Premiums and Incurred Claims shown in worksheet 1 of the URRT. Note that there are timing differences in the 2 reports. The General Ledger is prepared by Accounting and uses the General Ledger and 2020 Calendar Year with no adjustments or run-out. The URRT data comes from the data warehouse and includes any adjustments made January – March 2021.

XXIX. CSR SUBSIDY

This filing assumes that the Cost Share Reduction subsidy will not be funded in 2022. Therefore, the Silver plans that are offered both on and off exchange have an additional rating factor, as shown in our rate manual, to adjust the premium rates for the loss of the subsidies.

To develop the factor, we made assumptions on the population migration due to high silver premiums both on and off exchange to determine the base membership left in silver plans that would receive the load for the additional cost. We then took the expected subsidy amount that would be lost in 2022 and spread it over the expected premium for the base membership left in silver plans.