| State: | District of Columbia | Filing Company: Aetna Life Insurance Company |
| :--- | :--- | :--- |
| TOI/Sub-TOI: | H15G Group Health - Hospital/Surgical/Medical Expense/H15G.003 Small Group Only |  |
| Product Name: | DC ALIC PPO SG 2021 |  |
| Project Name/Number: | 2021 Exchanges - Aetna/ALIC |  |

## Filing at a Glance

Company:
Product Name:
State:
TOI:
Sub-TOI:
Filing Type:
Date Submitted:
SERFF Tr Num:
SERFF Status:
State Tr Num:
State Status:
Co Tr Num:
Implementation
Date Requested:
Author(s):
Reviewer(s):
Disposition Date:
Disposition Status:
Implementation Date:
State Filing Description:

Aetna Life Insurance Company
DC ALIC PPO SG 2021
District of Columbia
H15G Group Health - Hospital/Surgical/Medical Expense
H15G. 003 Small Group Only
Rate
05/01/2020
AETN-132353171
Assigned

DCALICSG2021
01/01/2021

Regis Murayi, Joanna Kluza, Elizabeth Mangan, Arthur Goodell, Lindsay Szeto Dave Dillon (primary), Philip Barlow, Darniece Shirley, Efren Tanhehco, John Morgan

| State: | District of Columbia | Filing Company: Aetna Life Insurance Company |
| :--- | :--- | ---: |
| TOI/Sub-TOI: | H15G Group Health - Hospital/Surgical/Medical Expense/H15G.003 Small Group Only |  |
| Product Name: | DC ALIC PPO SG 2021 |  |
| Project Name/Number: | 2021 Exchanges - Aetna/ALIC |  |

## General Information

Project Name: 2021 Exchanges - Aetna
Project Number: ALIC
Requested Filing Mode: Review \& Approval
Explanation for Combination/Other:
Submission Type: New Submission
Group Market Type: Employer
Filing Status Changed: 05/02/2020
State Status Changed:
Created By: Joanna Kluza
Corresponding Filing Tracking Number:
PPACA: Non-Grandfathered Immed Mkt Reforms
PPACA Notes: null
Exchange Intentions:

Status of Filing in Domicile:
Date Approved in Domicile:
Domicile Status Comments:
Market Type: Group
Group Market Size: Small
Overall Rate Impact: 38.03\%
Deemer Date:
Submitted By: Joanna Kluza

Filing Description:
Aetna Life Insurance Company 1Q21 Small Group PPO rate filing for DC.
The corresponding forms filing was submitted separately. The SERFF ID Number is AETN-132229307.

## Company and Contact

## Filing Contact Information

Regis Murayi, Actuarial Consultant
151 Farmington Ave
Hartford, CT 06156
Filing Company Information
Aetna Life Insurance Company
151 Farmington Avenue
Hartford, CT 06156
(860) 273-0123 ext. [Phone]

MurayiR@aetna.com
860-273-8566 [Phone]
Includes forms for products to be offered to Small Groups on the DC Health Benefits Exchange.

## Filing Fees

Fee Required? No
Retaliatory? No
Fee Explanation:

| State: | District of Columbia Filing Company: | Aetna Life Insurance Company |
| :---: | :---: | :---: |
| TOI/Sub-TOI: | H15G Group Health - Hospital/Surgical/Medical Expense/H15G. 003 Small Group Only |  |
| Product Name: | DC ALIC PPO SG 2021 |  |
| Project Name/Number: | 2021 Exchanges - Aetna/ALIC |  |

## Rate Information

Rate data applies to filing.

| Filing Method: | Review \& Approval |
| :--- | :--- |
| Rate Change Type: | Decrease |
| Overall Percentage of Last Rate Revision: | $-1.560 \%$ |
| Effective Date of Last Rate Revision: | $01 / 01 / 2020$ |
| Filing Method of Last Filing: | Review \& Approval |
| SERFF Tracking Number of Last Filing: | AETN-131944476 |

Company Rate Information


| State: | District of Columbia | Filing Company: Aetna Life Insurance Company |
| :--- | :--- | ---: |
| TOI/Sub-TOI: | H15G Group Health - Hospital/Surgical/Medical Expense/H15G.003 Small Group Only |  |
| Product Name: | DC ALIC PPO SG 2021 |  |
| Project Name/Number: | 2021 Exchanges - Aetna/ALIC |  |

## Rate Review Detail

## COMPANY:

Company Name: Aetna Life Insurance Company

HHS Issuer Id:
77422
PRODUCTS:

| Product Name | HIOS Product ID | HIOS Submission ID | Number of Covered <br> Lives |
| :--- | ---: | ---: | :--- |
| DC ALIC PPO SG | 77422 DC009 | 1742811813294280707 | 779 |

Trend Factors:

## FORMS:

New Policy Forms:
AL SG-SOB-EPO-14045159 05-HIX,AL SG-SOB-EPO-14045160 05-HIX,AL SG-SOB-EPO-14045161 05-HIX,AL SG-SOB-EPO-14045163 05-HIX,AL SG-SOB-EPO14045165 05-HIX,AL SG-SOB-EPO-14045167 05-HIX,AL SG-SOB-EPO-14045169 05HIX,AL SG-SOB-EPO-14045171 05-HIX
Affected Forms:
Other Affected Forms:
REQUESTED RATE CHANGE INFORMATION:
Change Period:
Quarterly
Member Months:
2,964
Benefit Change:
Percent Change Requested:

## PRIOR RATE:

Total Earned Premium:
Total Incurred Claims:
Annual \$:

## REQUESTED RATE:

Projected Earned Premium:
Projected Incurred Claims:
Annual \$:

None
Min: 36.39 Max: 43.58 Avg: 38.03

440,306.00
346,629.00
Min: 415.30 Max: 580.90 Avg: 565.22

497,768.00
421,565.00
Min: 566.43 Max: 834.06 Avg: 780.17

| State: | District of Columbia Filing Company: | Aetna Life Insurance Company |
| :---: | :---: | :---: |
| TOI/Sub-TOI: | H15G Group Health - Hospital/Surgical/Medical Expense/H15G. 003 Small Group Only |  |
| Product Name: | DC ALIC PPO SG 2021 |  |
| Project Name/Number: | 2021 Exchanges - Aetna/ALIC |  |

## Rate/Rule Schedule

| Item <br> No. | Schedule Item <br> Status | Document Name | Affected Form Numbers (Separated with commas) | Rate Action | Rate Action Information | Attachments |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 |  | DC SG ALIC PPO 2021 | AL SG-SOB-EPO-14045159 05-HIX, AL SG-SOB-EPO-$1404516005-\mathrm{HIX}$, AL SG-SOB-EPO-14045161 05-HIX, AL SG-SOB-EPO-14045163 05-HIX, AL SG-SOB-EPO-$1404516505-$ HIX, AL SG-SOB-EPO-14045167 05-HIX, AL SG-SOB-EPO-14045169 05-HIX, AL SG-SOB-EPO14045171 05-HIX | Revised | Previous State Filing Number: <br> AETN-131944476 <br> Percent Rate Change Request: <br> 38.03 | DC SG 77422 Rates ON_1 Q2021_vi.xlsm, DC $\bar{S} G 7742 \overline{2}$ Rates ON-1 Q2021 v1.pdf, DC_SG_77422_Rates ON 2Q2021 v1.pdf, DC_ $\overline{\text { S }}$ G 77422_Rates ON 3Q2021 v1.pdf, DC S̄G $7742 \overline{2}$ Rates _ON_4Q̄2021_v1.pdf, |


| State: | District of Columbia | Filing Company: |
| :--- | :--- | :--- |$\quad$ Aetna Life Insurance Company

Attachment DC_SG_77422_Rates_ON_1Q2021_v1.xlsm is not a PDF document and cannot be reproduced here.









| State: | District of Columbia | $\quad$ Filing Company: Aetna Life Insurance Company |
| :--- | :--- | :--- |
| TOI/Sub-TOI: | H15G Group Health - Hospital/Surgical/Medical Expense/H15G.003 Small Group Only |  |
| Product Name: | DC ALIC PPO SG 2021 |  |
| Project Name/Number: | 2021 Exchanges - Aetna/ALIC |  |

## Supporting Document Schedules

| Bypassed - Item: | Actuarial Justification |
| :--- | :--- |
| Bypass Reason: | This is not a new form filing. |
| Attachment(s): |  |
| Item Status: |  |
| Status Date: | Actuarial Memorandum |
| Satisfied - Item: | DC_SG_State_Actuarial_Memo_1Q2021_ALIC.pdf |
| Comments: |  |
| Attachment(s): | Actuarial Memorandum and Certifications |
| Item Status: |  |
| Status Date: | DC_SG_77422_URRT_Part_III_Memo_and_Cert_ALIC_2021.pdf |
| Satisfied - Item: | DC_SG_77422_URRT_Part_III_Memo_and_Cert_ALIC_2021_redacted.pdf |
| Comments: |  |
| Attachment(s): | Certificate of Authority to File |
| Item Status: | The filing is made by Aetna. |
| Status Date: |  |
| Bypassed - Item: |  |
| Bypass Reason: |  |
| Attachment(s): | DC SG SHOP Cover Letter - ALIC 1Q21.pdf |
| Item Status: |  |
| Status Date: | Consumer Disclosure Form |
| Satisfied - Item: |  |
| Comment: |  |
| Attachment(s): |  |
| Item Status: |  |
| Status Date: |  |
| Satisfied - Item: |  |
| Comments: |  |
| Attachment(s): |  |




Product Name:
Project Name/Number:

2021 Exchanges - Aetna/ALIC

Attachment DISB Actuarial Memo Dataset_ALIC_2021_submission.xIsx is not a PDF document and cannot be reproduced here.

Attachment DC_SG_77422_URRT_ON_1Q2021_v1.xIsm is not a PDF document and cannot be reproduced here.

# Aetna Life Insurance Company - District of Columbia 1Q21 Filing - Small Group Business HIOS product ID: 77422DC011 <br> Actuarial Memorandum 

## Statement of Purpose for Filing

This actuarial memorandum supports Aetna Life Insurance Company commercial base rates for District of Columbia small groups effective beginning January 1, 2021. The purpose of this memorandum is to comply with the District of Columbia, Department of Insurance, Securities and Banking, Health Insurance Rate Filing Procedures and to provide adequate supporting information for our proposed rates pursuant to the DC Official Code, Title 31, Subtitle IV, Chapter 34.

The requested rates have been developed incorporating consideration of the market changes and rating requirements taking effect in the Small Group market pursuant to the Patient Protection and Affordable Care Act of 2010 and subsequent regulation. They are compliant with all rating limitations under federal and state regulation. The plan designs contained in this submission are to be sold on the Exchange.

The descriptions and analyses presented in this rate filing reflect our current understanding of regulations and guidance. As further guidance is received, we reserve the right to submit revisions or withdraw this rate filing.

## Summary of Changes from prior filing and rate manual

We are proposing to revise the quarterly premium rates for effective dates from January 1, 2021 through December 31, 2021. The quarterly rate increases are reflected in Exhibit 7. Generally, rate changes do not vary by plan design, with the exception of the impact associated with plan-specific benefit modifications necessary to comply with Actuarial Value requirements.

Rates for the plans in this submission are being revised to reflect 1) the impact of updated experience data and medical claim trend and 2) changes in cost-sharing levels to ensure that plans comply with Actuarial Value requirements.

There are no other proposed changes for this submission.

## Form Numbers

An exhibit showing the Form Numbers is shown on under the "Certificate of Form Names and Numbers" Exhibit of this Actuarial Memorandum.

## Status of Forms

The forms for this submission are "open to new sales" and "non-grandfathered".

## Description of Benefits/Metal Levels and Actuarial Values

This filing covers PPO group medical benefit coverage. The range of coverage includes inpatient, outpatient, primary care, specialist services, pharmacy, DME, and vision. Information on the costsharing parameters of the covered benefit plans, including deductibles and copays, can be found in the Schedule of Benefits in the Form filing (AETN-132229307). All benefits are compliant with state mandates and the requirements of the Patient Protection and Affordable Care Act of 2010, including preventive care benefits, deductible limits, and Actuarial Value requirements.

Exhibit A shows the metal level and actuarial value for each plan design using the AV calculator developed and made available by HHS.

## Average Rate Increase Requested

The following tables provide the requested weighted average increases. The first table shows the incremental increase and the second table shows the year over year increase.

|  | 1Q21/4Q20 | 2Q21/1Q21 | 3Q21/2Q21 | 4Q21/3Q21 |
| :--- | :---: | :---: | :---: | :---: |
| Incremental Rate Increase | $28.53 \%$ | $2.72 \%$ | $2.72 \%$ | $2.72 \%$ |


|  | 1Q21/1Q20 | 2Q21/2Q20 | 3Q21/3Q20 | 4Q21/4Q20 | Average |
| :--- | :---: | :---: | :---: | :---: | :---: |
| Requested Rate Increase | $37.64 \%$ | $38.20 \%$ | $38.76 \%$ | $39.33 \%$ | $38.04 \%$ |

## Maximum Rate Increase Requested

The maximum rate increase that could be applied to a policyholder based on changes to the base rate and rate factors is $44.92 \%$. This rate increase applies to members renewing in 4 Q 21 for the DC Bronze OAEPO 6000 80\% \$15/50 E plan (HIOS ID 77422DC0110001).

## Minimum Rate Increase Requested

The minimum rate increase that could be applied to a policyholder based on changes to the base rate and rate factors is $36.00 \%$. This rate increase applies to members renewing in 1Q21 for the DC Silver OAEPO 4800 80\% \$25/45 E plan (HIOS ID 77422DC0110007).

## Absolute Maximum Premium Increase

The absolute maximum year-over-year renewal rate increase that could be applied to a policyholder, including demographic changes like aging, is 61.09\%. This rate increase applies to members renewing in 1 Q21 for DC Bronze OAEPO $600080 \% \$ 15 / 50$ E plan (HIOS ID 77422DC0110001) that age up from 20 to 21.

## Average Renewal Rate Increase for a Year

The average renewal rate increase, weighted by written premium, for renewals in the year ending with the effective period of the rate filing is $38.04 \%$

## Rate Change History

The rate change history for the forms referenced in the filing is shown below.

| Rate Effective Date | Annual Total Change |
| :---: | :---: |
| 4Q19 | $11.7 \%$ |
| $1 Q 20$ | $-0.6 \%$ |
| $2 Q 20$ | $-1.8 \%$ |
| 3Q20 | $-2.9 \%$ |
| 4Q20 | $-4.1 \%$ |

## Exposure

The current exposure as of December 2019 is 28 policies, 285 certificates, and 444 covered lives.

## Member Months

The numbers of members in force during each month of the base experience used in the rate development and for the preceding 12 month period for the forms referenced in this filing are shown in the Loss Ratio History Exhibit of the Actuarial Memorandum.

## Past Experience

The monthly earned premium and incurred claims for the base experience period used in the rate development and for the preceding 12 month period for the forms referenced in this filing are shown in the Loss Ratio History Exhibit of the Actuarial Memorandum.

## Index Rate

The index rate $=\$ 771.60$

## Rate Development

## Determination of Claim Portion of Market Index Rate

In setting the projected claim level in the market in 2021, we based our projections upon the 2018 and 2019 experience of our current ACA small group block of business for Innovation Health Plan, Inc. and Innovation Health Insurance Company, in the 2-50 market. The experience data utilized in the rate development reflects incurred claims from January 1, 2019 to December 31, 2019 and paid through January 2020. This manual experience is the HMO Small Group Experience for Innovation Health Plan, Inc. and PPO Small Group Experience for Innovation Health Insurance Company in Northern Virginia.

The manual experience used to develop the rates is shown below:

| DOS | Membership | Claims | Premium * | Loss <br> Ratio |
| :--- | ---: | ---: | ---: | :---: |
| $01 / 01 / 2019$ | 17,209 | $5,700,768$ | $7,750,020$ | $73.56 \%$ |
| $02 / 01 / 2019$ | 16,625 | $5,312,781$ | $7,530,106$ | $70.55 \%$ |
| $03 / 01 / 2019$ | 15,993 | $5,599,347$ | $7,300,687$ | $76.70 \%$ |
| $04 / 01 / 2019$ | 15,160 | $5,093,401$ | $6,972,044$ | $73.05 \%$ |
| $05 / 01 / 2019$ | 14,329 | $5,118,321$ | $6,626,751$ | $77.24 \%$ |
| $06 / 01 / 2019$ | 13,250 | $4,838,214$ | $6,200,445$ | $78.03 \%$ |
| $07 / 01 / 2019$ | 12,517 | $4,529,024$ | $5,919,553$ | $76.51 \%$ |
| $08 / 01 / 2019$ | 11,964 | $5,097,818$ | $5,691,171$ | $89.57 \%$ |
| $09 / 01 / 2019$ | 10,872 | $3,822,212$ | $5,268,406$ | $72.55 \%$ |
| $10 / 01 / 2019$ | 9,905 | $4,395,706$ | $4,835,611$ | $90.90 \%$ |
| $11 / 01 / 2019$ | 9,396 | $3,712,825$ | $4,609,890$ | $80.54 \%$ |
| $12 / 01 / 2019$ | 6,120 | $2,127,710$ | $3,247,268$ | $65.52 \%$ |
| Total | 153,340 | $55,348,125$ | $71,951,951$ | $76.92 \%$ |

*Note: Premiums shown are not risk adjusted. The current estimate of the 2019 risk-adjusted loss ratio is $77.0 \%$.

Total incurred claims are developed by estimating the incurred but not reported (IBNR) reserves using aggregate block of business paid claims. Paid claims are adjusted using the IBNR completion factors. More specifically, historical claim payment patterns are used to predict the ultimate incurred claims for each date-of-service month. The IBNR is estimated using actuarial principles and assumptions which consider historical claim submission and adjudication patterns, unit cost and utilization trends, claim inventory levels, changes in membership and product mix, seasonality, and other relevant factors including a review of large claims. This same process is used to develop IBNR estimates for allowed claims.

As noted above, the experience period reflects one month of paid claim run-off. The IBNR reserves account for approximately $0.71 \%$ of the experience period incurred claims.
For the projection, the following was taken into consideration:
A. Changes in the Morbidity of the Population Insured:

The experience period data includes experience for policies issued to small employers in 2018 and 2019. We considered the expected relationships between the morbidity of the experience policies and the likely population that will be covered by Small Group Single Risk Pool policies in 2021.
B. Changes in Benefits:

The products included in this filing include benefits necessary to comply with the Essential Health Benefit requirements. The experience data includes experience for Single Risk Pool products that have essentially identical benefits.

The change in projected utilization due to changes in benefits is also considered. As cost sharing decreases (measured by increasing Actuarial Value), utilization increases. This pattern is reflected in the factors that are built into the federal risk adjustment mechanism that started in 2014. The federal risk adjustment program factors and other proprietary models were considered in the development of the utilization change. The average cost sharing in the experience period was compared with the average cost sharing in the projection period. From the average cost sharing change, an expected utilization change was derived.
C. Changes in Demographics:

Experience data was normalized for projected changes in the age/gender mix and area mix using internally-developed factors. Exhibits 2 and 3 contain detail on the calculations of the impact of demographic mix shifts.

## D. Other Adjustments:

The 'Other' adjustment includes the projected impact of changes in network composition and provider contracts.

Determination of Retention Portion of Market Index Rate
The retention portion of the projected premium is illustrated in Exhibit 5.
The prospective general and administrative expenses are based on historical corporate small group market expense levels, current-year projections, and projected changes in expenses, inflation, and membership for 2021. The commission expense factor covers anticipated sales and marketing expenses. Those may include, without limitation, purchase of television, internet and other advertising; payments of commissions and other incentive compensation to Company's internal sales force; and payment of commissions to external brokers. The exact amounts and distribution among the categories of sales and marketing expenses will depend on a variety of factors including competitive conditions, business strategy, consumer behaviors, and legal and regulatory requirements. The consumer behaviors would capture whether they use a particular distribution channel, commissioned or not, as well as their experience.

Federal taxes include PPACA Taxes and Fees are based on the Notice of Benefit and Payment Parameters for 2021, as well as Federal income tax. The risk adjustment user fee is applied to the
projected risk adjustment transfer and therefore, excluded from the taxes and fees shown under nonbenefit expenses. State premium taxes are estimated on most current known levels and include any known assessments.

The profit and risk load is consistent with the target used in our initial pricing of 2020.

## Requested Rates

Rates are determined using the prescribed member build-up approach. In the event that a family includes more than three dependents under age 21, only the three oldest dependents will be considered in determining the family's premium. Additional dependents (non-billable members) will not be included in the rate calculation.

The premium for each billable member is calculated as:
Calibrated Plan Adjusted Index Rate * Age Factor * Area Factor * Trend Factor
The resulting rate is rounded to the nearest cent, and rates are then summed for all billable family members.

An example of a contract's premium determined by the member build-up calculation is shown in Exhibit 9.

## Credibility Assumption

Experience data for the District of Columbia is assigned $24 \%$ credibility.

## Trend Assumption

Anticipated annual trend from the experience period to the rating period for the product line is shown in the following table. The table shows the trend assumptions by major types of service as defined by HHS, separately by unit cost, utilization, and in total.

| Type of Service | Unit Cost | Utilization | Total |
| :--- | :---: | :---: | :---: |
| Inpatient Hospital | $5.6 \%$ | $2.5 \%$ | $8.2 \%$ |
| Outpatient Hospital | $3.6 \%$ | $7.0 \%$ | $10.8 \%$ |
| Professional | $1.5 \%$ | $7.0 \%$ | $8.6 \%$ |
| Other Medical | $3.6 \%$ | $7.0 \%$ | $10.8 \%$ |
| Capitation | $0.0 \%$ | $0.0 \%$ | $0.0 \%$ |
| Prescription Drug | $9.7 \%$ | $\mathbf{2 . 6} \%$ | $12.6 \%$ |
| Total | $\mathbf{4 . 5 \%}$ | $\mathbf{5 . 6 \%}$ | $\mathbf{1 0 . 2 \%}$ |

a. Medical Trend

Allowed medical trend includes known and anticipated changes in provider contract rates, severity and medical technology impacts, and expected changes in utilization. The impact of benefit leveraging is accounted for separately in the projected paid to allowed ratio.
b. Pharmacy Trend

Pharmacy trend considers the impact of formulary changes, patent expirations, new drugs, other general market share shifts, and overall utilization trend.

## Cost-sharing changes \& Benefit Changes

Aetna's rate review models project incurred claims and earned premiums assuming a static benefit plan mix for the book of business for the experience period. Since Aetna prices the book of business utilizing a target loss ratio approach, adjustments made to the incurred claims and earned premiums to account for the anticipated changes to the plan mix would offset resulting in the same projected loss ratio. The Plan Relativity Factors adjust future premium levels to align with the expected claims for changes in plan mix for future dates of service.

## Plan Relativities

The Plan Relativities represent the expected value of the difference in benefits and networks between the market index rate and each additional proposed benefit plan discussed in this filing. The relativities were developed using a proprietary pricing model which relies on State- and product-specific benefit service category weights and rating factors for various levels of plan/member cost-sharing options for deductibles, coinsurance, out-of-pocket maximums and copays.

The product-specific service category weights were developed based on the experience of Aetna's Small Group block of business. The cost-sharing-specific rating factors were developed using experience associated with our Large Group block of business, which excludes the effects of selection. These Large Group based cost-sharing specific rating factors account for differences in a standard population's spending patterns due to differences in the richness and/or structure of benefits, or induced demand, without reflection of differences in health status.

Final plan relativities reflect the value of the EHB and state mandated benefits (including pediatric dental), incorporating the impact of out-of-network benefits and additional benefits. The methodology also considers the value of any differences in network by plan, including but not limited to network discounts and steerage.

## Rating Factors

## Effective Date Factors

Exhibit 7 illustrates the quarterly trend factors, the resulting index rate for effective dates during each calendar quarter, the projected membership distribution by effective date, and the weighted-average index rate. Trend factors are developed from annual forward trend and leveraging. A trend factor of 1.00 corresponds to a policy period that begins January 1, 2021.

## Member Age Factor

The age factors are based on the DC specific age scale. The factors are shown in Exhibit 11.

## Tobacco Factors

No load is proposed for tobacco users.

## Area Factors

Exhibit 3 summarizes the rating area definitions and factors and displays the projected membership by area to develop the projected average area factor. The geographic calibration factor is the reciprocal of the projected average area factor.

## Wellness Programs

Aetna may encourage and incent members to access certain medical services, to use online tools that enhance their coverage and services, and to continue participation as an Aetna member. Members and their doctor can talk about these medical services and decide if they are right for the member. Aetna may also encourage and incent members in connection with participation in a wellness or health improvement program. Incentives include but are not limited to:

- Modification to copayment, deductible or coinsurance amounts
- Premium discounts or rebates
- Contributions to health savings account
- Fitness center membership reimbursement
- Merchandise
- Coupons
- Gift cards
- Debit cards
- Any combination of the above

The award of any such incentive shall not depend upon the result of a wellness or health improvement activity or upon a member's health.

## Distribution of Rate Increases

The distribution of rate increases (annual) is shown in Exhibit A-1. The increases are shown by Plan.

## Claim Reserve Needs

Total incurred claims are developed by estimating the incurred but not reported (IBNR) reserves using aggregate block of business paid claims. Paid claims are adjusted using the IBNR completion factors. More specifically, historical claim payment patterns are used to predict the ultimate incurred claims for each date-of-service month. The IBNR is estimated using actuarial principles and assumptions which consider historical claim submission and adjudication patterns, unit cost and utilization trends, claim inventory levels, changes in membership and product mix, seasonality, and other relevant factors including a review of large claims. This same process is used to develop IBNR estimates for allowed claims.

The experience data reflects incurred claims from January 1, 2019 through December 31, 2019 and paid through January 31, 2020. The paid claims for the DC Base experience period are $\$ 2,119,451$. The estimated incurred claims are $\$ 2,172,103$.

## Administrative Costs of Programs that Improve Health Care Quality

The administrative costs included with claims in the numerator of the MLR calculation are shown in Exhibit 6 (MLR Projection).

## Taxes and Licensing or Regulatory Fees

The taxes, licenses and fees removed from premium in the denominator of the MLR calculation are shown in Exhibit 6 (MLR Projection).

## Medical Loss Ratio (MLR)

The projected Medical Loss Ratio (MLR) as defined by HHS is $88.0 \%$ and meets the minimum MLR requirements of Insurance Art. § 15-605(c). The details of the MLR calculation are shown in Exhibit 6 (MLR Projection).

## Risk Adjustment

## Risk Adjustment - Experience Period

Risk Adjustment transfer is accrued at the issuer and market level based on 2019 Wakely accruals. The transfer is allocated to the member-level based by applying the HHS risk transfer calculation to each member relative to the imputed market average; such that members with higher resulting relative transfer scores may have a receivable and members with lower resulting scores may have a payable,
regardless of the net market risk transfer result. The resulting member transfers are summed to the HIOS plan level and adjusted for 2019 Risk Adjustment fees of \$0.19 PMPM in Worksheet 2.

## Risk Adjustment - Projection Period

Aetna is projecting a risk adjustment receivable. We expect that we will have membership enrolled under the market average morbidity. The resulting PMPM adjustment, net of risk adjustment user fees, is $\$ 26.02$ PMPM.

## Reinsurance

Transitional Reinsurance recoveries do not apply to Small Group business. The experience period data does not contain Reinsurance Contributions during 2019.

## Risk Corridor

The Risk Corridor program does not apply to Small Group business.

## Past and Prospective Loss Experience Within and Outside the State

The loss experience used in the development of the rates was based on the HMO Small Group experience for Innovation Health Plan, Inc. and PPO Small Group experience for Innovation Health Insurance Company in Northern Virginia.

## Reasonable Margin for Reserve Needs \& Past and Prospective Expenses

The retention portion of the projected premium is illustrated in Exhibit 5.
The prospective general and administrative expenses are based on historical corporate small group market expense levels, current-year projections, and projected changes in expenses, inflation, and membership for 2021. The commission expense factor covers anticipated sales and marketing expenses. Those may include, without limitation, purchase of television, internet and other advertising; payments of commissions and other incentive compensation to the Company's internal sales force; and payment of commissions to external brokers. The exact amounts and distribution among the categories of sales and marketing expenses will depend on a variety of factors including competitive conditions, business strategy, consumer behaviors, and legal and regulatory requirements. The consumer behaviors would capture whether they use a particular distribution channel, commissioned or not, as well as their experience.

Federal taxes include PPACA Taxes and Fees are based on the Notice of Benefit and Payment Parameters for 2021, as well as Federal income tax. State premium taxes are estimated on most current known levels and include any known assessments.

The profit and risk load is consistent with the target used in the initial pricing for our 2020 plans.

## Any Other Relevant Factors Within and Outside the State

All relevant Factors within and outside the State have been considered in the development of the proposed rates.

## Any other information needed to support the requested rates or to comply with Actuarial Standard of Practice No. 8

This filing is in conformity with all the applicable Actuarial Standards of Practice, including ASOP No. 8.

## Actuarial Certification

I, Joanna Kluza, am an employee of Aetna Inc. and a member of the American Academy of Actuaries. I have reviewed the enclosed rates submitted by Aetna Life Insurance Company for the District of Columbia.

These rates reflect the negotiated prices from the provider contracts and the expected utilization experience of the plan.

I relied upon financial records and summaries prepared by responsible officers and employees of Aetna Life Insurance Company. In other respects, my analysis included review of assumptions that I considered necessary.

For preparation of the rates, items identified above:
(i). are computed in accordance with commonly accepted actuarial standards consistently applied and are fairly stated in accordance with sound actuarial principles,
(ii). meet the requirements of Washington D.C,
(iii). make a good and sufficient provision for all unpaid claims of the organization under the terms of its contracts and agreements, and
(iv). include appropriate provision for all actuarial items which ought to be established where allowed by law.

A target medical loss ratio of $82.2 \%$ was used for this filing calculated in the traditional way. The expected 2021 MLR for this filing, as defined by PPACA and before any credibility adjustment, is $88.0 \%$.

These rates are appropriate for quotes delivered for effective dates beginning January 1, 2021. The proposed change is an increase greater than the 10\% threshold and will trigger the federal review requirements as specified under 45 CFR Part 154.

This rate filing conforms to the benefit plan provisions required by the Patient Protection and Affordable Care Act (P.L. 111-148) of 2010.

In my opinion, the enclosed rates are reasonable in relation to the anticipated experience of Aetna Life Insurance Company. They are neither excessive nor inadequate, nor unfairly discriminatory.


Joanna Kluza, ASA, MAAA
May 1, 2020
Date
Aetna Life Insurance Company

## District of Columbia Small Group ALIC (PPO plans) Loss Ratio History

| DOS | Membership | Claims | Premium* | Loss Ratio |
| :---: | :---: | :---: | :---: | :---: |
| 01/01/2018 | 904 | 452,458 | 393,132 | 91.13\% |
| 02/01/2018 | 919 | 211,789 | 399,127 | 80.25\% |
| 03/01/2018 | 941 | 223,934 | 409,186 | 71.83\% |
| 04/01/2018 | 937 | 411,102 | 407,872 | 61.25\% |
| 05/01/2018 | 940 | 388,705 | 409,779 | 75.05\% |
| 06/01/2018 | 910 | 295,776 | 400,016 | 67.64\% |
| 07/01/2018 | 923 | 288,710 | 406,641 | 59.24\% |
| 08/01/2018 | 911 | 409,996 | 406,038 | 54.64\% |
| 09/01/2018 | 889 | 268,080 | 392,903 | 58.90\% |
| 10/01/2018 | 903 | 277,096 | 400,771 | 47.42\% |
| 11/01/2018 | 891 | 362,682 | 394,522 | 46.16\% |
| 12/01/2018 | 824 | 225,421 | 367,543 | 60.02\% |
| 01/01/2019 | 333 | 183,160 | 165,439 | 110.71\% |
| 02/01/2019 | 321 | 227,793 | 159,223 | 143.07\% |
| 03/01/2019 | 276 | 332,890 | 137,734 | 241.69\% |
| 04/01/2019 | 266 | 204,200 | 132,359 | 154.28\% |
| 05/01/2019 | 251 | 396,716 | 121,984 | 325.22\% |
| 06/01/2019 | 244 | 106,299 | 118,131 | 89.98\% |
| 07/01/2019 | 243 | 143,866 | 118,156 | 121.76\% |
| 08/01/2019 | 237 | 128,816 | 114,830 | 112.18\% |
| 09/01/2019 | 211 | 111,481 | 98,073 | 113.67\% |
| 10/01/2019 | 200 | 96,014 | 91,256 | 105.21\% |
| 11/01/2019 | 200 | 97,639 | 96,558 | 101.12\% |
| 12/01/2019 | 182 | 105,832 | 89,852 | 117.78\% |
| CY2018 | 10,892 | 3,815,748 | 4,787,529 | 79.70\% |
| CY2019 | 2,964 | 2,134,705 | 1,443,596 | 147.87\% |

*Note: Premiums shown are not risk adjusted. The current estimate of the 2019 risk adjusted loss ratio is 93.2\%.

## Certificate Form Names and Numbers

| Form Name | Form Number |
| :--- | :--- |
| AL DC SG HHIXCOC V005 | AL SG HCOC-2021-EPO 05-HIX |
| AL DC HGrpAg V003 | AL HGrpPol 03 |

Schedule Form Names and Numbers

| Form Name | Form Number |
| :--- | :--- |
| AL DC SG-HIXSOB-14045159 V005 | AL SG-SOB-EPO-14045159 05-HIX |
| AL DC SG-HIXSOB-14045160 V005 | AL SG-SOB-EPO-14045160 05-HIX |
| AL DC SG-HIXSOB-14045161 V005 | AL SG-SOB-EPO-14045161 05-HIX |
| AL DC SG-HIXSOB-14045163 V005 | AL SG-SOB-EPO-14045163 05-HIX |
| AL DC SG-HIXSOB-14045165 V005 | AL SG-SOB-EPO-14045165 05-HIX |
| AL DC SG-HIXSOB-14045167 V005 | AL SG-SOB-EPO-14045167 05-HIX |
| AL DC SG-HIXSOB-14045169 V005 | AL SG-SOB-EPO-14045169 05-HIX |
| AL DC SG-HIXSOB-14045171 V005 | AL SG-SOB-EPO-14045171 05-HIX |

## Actuarial Memorandum and Certification

## General Information

Company Identifying Information:

Company Legal Name:
State:
HIOS Issuer ID:
Market:
Effective Date:
Rate Filing Tracking Number:
Policy Form(s):
Form Filing Tracking Number:

Aetna Life Insurance Company<br>District of Columbia<br>77422<br>Small Group<br>01/01/2021<br>AETN-132353171

AETN-132229307

Company Contact Information:

| Name: | Joanna Kluza |
| :--- | :--- |
| Telephone Number: | (860)273-3099 |
| Email Address: | KluzaJ@aetna.com |

## 1. Purpose, Scope, and Effective Date

The purpose of this filing is to:

1) Provide support for the development of the Part I Unified Rate Review Template;
2) Provide support for the assumptions and premiums rate development for the products supported by the policy forms referenced above;
3) Request approval of the proposed monthly premium rates; and
4) Provide benefit plan designs summaries for the products included in this filing.

The development of the rates reflects the impact of the market forces and rating requirements associated with the Patient Protection and Affordable Care Act (PPACA) and subsequent regulation. These rates are for plans issued in District of Columbia beginning January 1, 2021. The rates comply with all rating guidelines under federal and state regulations. The filing covers plans that will be offered outside the public Marketplace in District of Columbia.

## 2. Proposed Rate Increase

Monthly premium rates for Small Group Market products in District of Columbia are being revised for effective dates January 1, 2021 through December 31, 2021.
A. Reason for Rate Increase(s):

- Impact of medical claim trend (including changes in provider unit costs and increased utilization of medical cost services) and pharmacy trend;
- Revisions to our assumptions about market-wide population morbidity and the projected population distribution;
- Revisions to administrative expense projections;
- Modifications in cost sharing to ensure that plans comply with Actuarial Value requirements;
- Updates to our pricing models used to determine the impact of cost sharing designs;
- Changes in provider networks and contracts.
- Expansion of definition for Small Group eligibility down to one sole proprietor
B. Variation in Rate Changes by Plan/Product:

Rate changes differ by plan for the following reasons:

- Provider cost estimates have been updated, and the change differs by network.
- Modification to cost sharing differs by plan in order to maintain compliance with Actuarial Value and other regulatory requirements.
- Our internal pricing models have been updated to reflect more current information on levels of induced demand associated with different benefit designs. These changes impact our estimates of the relative costs of the plan designs that will be offered.

Exhibit 1 shows the average threshold increases for products covered by this filing.

## 3. Experience Period Premium and Claims

A. Paid Through Date:

The experience data reported in Worksheet 1, Section I of the Part I Unified Rate Review Template reflects incurred claims from January 1, 2019 through December 31, 2019 and paid through January 31, 2020.
B. Current Date: The current enrollment and premium is reported as of March 31, 2020.
C. Premiums (Net of MLR Rebate) in Experience Period:

Experience period premiums are date-of-service premiums from our actuarial experience databases for non-grandfathered Small Group business in District of Columbia. Our internal projections indicate that no MLR rebate is expected to be paid in 2019 (for 2018 experience) for the Small Group MLR Pool in District of Columbia. As such, no adjustment was made to premiums to account for expected rebates.
D. Allowed and Incurred Claims Incurred During the Experience Period:

Allowed and incurred claims are sourced from our actuarial experience databases. These databases provide member-level detail on total allowed and incurred claims but do not include unit cost or utilization metrics. We allocate claims to cost categories and estimate the corresponding unit costs and utilization metrics by using an alternate reporting system that calculates unit cost and utilization metrics by medical cost category but only permits inclusion/exclusion of experience at the market and segment levels. A reconciliation of aggregate data in our actuarial experience databases is performed to ensure that data is consistent with the experience data contained in our enterprise-wide data warehouse.

Total incurred claims are developed by estimating the incurred but not reported (IBNR) reserves using aggregate block of business paid claims. Paid claims are adjusted using the IBNR completion factors. More specifically, historical claim payment patterns are used to predict the ultimate incurred claims for each date-of-service month. The IBNR is estimated using actuarial principles and assumptions which consider historical claim submission and adjudication patterns, unit cost and utilization trends, claim inventory levels, changes in membership and product mix, seasonality, and other relevant factors including a review of large claims. This same process is used to develop IBNR estimates for allowed claims.

As noted above, the experience period reflects one month of paid claim run-off. The IBNR reserves account for approximately $0.71 \%$ of the experience period incurred claims.

## 4. Benefit Categories

Our internal systems assign claims to several benefit categories. We have mapped these categories to the categories described in the Unified Rate Review Instructions released in April 2020. Inpatient Hospital consists of care delivered at an inpatient facility and associated expenses, including day-based mental health services. Outpatient Hospital includes outpatient surgical, outpatient mental health, and emergency care and associated expenses. Professional includes both specialty physician and primary care physician expenses, including office-based mental health services. Other includes dental, home health care, medical pharmacy expenses, laboratory expenses, and radiology expenses. Non-capitated ambulance is included in the Outpatient Hospital category when billed by the facility and included in Specialist Physician otherwise. Prescription Drug includes drugs dispensed by a pharmacy.

The utilization for these services are counted by service type, and aggregated for each benefit category. Inpatient Hospital utilization is counted as days; Outpatient Hospital, Professional, and Other Medical utilization are counted as visits. Prescription Drug utilization is counted per script.

## 5. Projection Factors

A. Changes in the Morbidity of the Population Insured:

The experience period data includes experience for community-rated policies issued to small employers in 2019.

We also considered the expected morbidity of the DC small group ACA population and the likely population that will be covered by Small Group Single Risk Pool policies in 2021 and have adjusted our projections for this morbidity change accordingly.

## B. Plan Design Changes:

The products included in this filing include benefits necessary to comply with the Essential Health Benefit requirements. The experience data includes experience for Single Risk Pool products that have essentially identical benefits and coverage issued outside the Single Risk Pool which does not cover all EHBs. The projection factor reflects the pro-rated impact of these additional benefits, as well as any changes in 2021 State Benchmark EHBs, and newly mandated benefits.

The change in projected utilization due to changes in benefits is also considered. As cost sharing decreases (measured by increasing Actuarial Value), utilization increases. This pattern is reflected in the factors that are built into the federal risk adjustment mechanism that started in 2014. The federal risk adjustment program factors and other proprietary models were considered in the development of the utilization change. The average cost sharing in the experience period was compared with the average cost sharing in the projection period. From the average cost sharing change, an expected utilization change was derived.
C. Changes in Demographics:

Experience data was normalized for projected changes in the age/gender mix and area mix using internally-developed factors. Exhibits 2 and 3 contain detail on the calculations of the impact of demographic mix shifts.
D. Other Adjustments:

The 'Other' adjustment includes the projected impact of changes in network composition and provider contracts, expected morbidity changes, changes in benefits, and changes in demographics.
E. Trend Factors (Cost/Utilization):

Medical trend factors are based on our Medical Economics Unit's national guidance coupled with local trend and network experience, based on analysis of a continuous normalized population, excluding catastrophic claims. Allowed medical trend includes known and anticipated changes in provider contract rates, severity and medical technology impacts, and expected changes in utilization. The impact of benefit leveraging is accounted for separately in the projected paid to allowed ratio.

Pharmacy trends are based on national commercial group Rx trend analysis. Pharmacy trend considers the impact of formulary changes, patent expirations, new drugs, other general market share shifts, and overall utilization trend. Pharmacy Trend is expressed in terms of allowed trend less rebates.

Year 1 and Year 2 trends on Worksheet 1 specify annual trends, with 12 months of trend applied to each year.

Exhibit 8 shows the anticipated annual trend from the experience period to the rating period.
6. Manual Rate Adjustments:
A. Source and Appropriateness of Experience Data Used:

The source data for our manual rate is the experience incurred from January 1, 2019 to December 31, 2019 and paid through January 2020 for issuers 12028 and 86443 in the Virginia Small Group HMO \& PPO market. The Small Group market experience is considered an appropriate source for the manual rate due to similarities in covered benefits and market dynamics to the current ACA Small Group market. The similar dynamics include: no individual medical underwriting and rating by gender, limits on age-rating, and caps for rating on the number of dependents, as well as plans benefits and cost-sharing.
B. Adjustments Made to the Data:

The Small Group experience used as the basis for the manual rate was adjusted in a similar manner as the base period experience for changes in population risk morbidity, benefits, and demographic and area normalizations. The data is further adjusted for projected changes in network, provider contract rates, and claims adjudication, in addition to unit cost and utilization trend.
C. Inclusion of Capitation Payments:

No services provided in 2021 will be covered by capitation arrangements. We have adjusted the experience data to incorporate our best-estimate of the impact of moving to fee for service payment approaches.

## 7. Credibility of Experience

The CMS Medicare full credibility standard is 24,000 member months. Based on our experience, the Medicare population has significantly higher utilization than Commercial populations. Using actuarial judgement, we have assigned $24 \%$ credibility to experience data, using 50,000 member months as the threshold. This is consistent with prior rate filings.
8. Risk Adjustment
A. Risk Adjustment - Experience Period

Risk Adjustment transfer is accrued at the issuer and market level based on 2019 Wakely accruals and our internal projections of how our risk relative to market has changed since that report was issued. The transfer is allocated to the member-level based by applying the HHS risk transfer calculation to each member relative to the imputed market-average, such that members with higher resulting relative transfers scores may have a receivable and members with lower resulting scores may have a payable, regardless of the net market risk transfer result. The resulting member transfers are summed to the HIOS plan level.
B. Risk Adjustment - Projection Period

We trended 2018 actual Risk Adjustment payments and 2019 Risk Adjustment accruals forward three and two years respectively. Resulting payment amounts were blended to determine our current risk transfer relative to the market.

In addition, the projected risk adjustment transfer includes changes that were outlined in the 2020 Notice of Benefit and Payment Parameters. The 2021 projected market average premium used in the payment transfer formula is also reduced by $14 \%$ to remove administrative cost.

As a result, we project a risk adjustment payable, net of the 2021 user fee of $\$ 0.19$ PBMPM. The resulting PMPM adjustment, net of risk adjustment user fees, is \$26.02.
9. Non-Benefit Expenses and Profit \& Risk

The retention portion of the projected premium is illustrated in Exhibit 5.
The prospective general and administrative expenses are set to achieve the $80 \%$ MLR threshold requirement. Actual general and administrative expenses are based on historical corporate Small Group market expense levels, 2021 projections, and projected changes in expenses, inflation, and membership for 2021 for our National book of Small Group business.

A flat commission per policy per month will be paid to all brokers in DC during open enrollment. Commissions do not vary by plan.

Federal taxes include PPACA Taxes and Fees are based on the Notice of Benefit and Payment Parameters for 2021, as well as Federal income tax and State Premium taxes. State premium taxes are estimated on most current known levels and include any known assessments.

The profit and risk load is consistent with the initial target used in pricing our 2020 plans.

## 10. Projected Loss Ratio

The expected 2021 MLR for this filing, as defined by PPACA and before any credibility adjustment, is shown in Exhibit 6.

## 11. Single Risk Pool

The plans and rates included in the Part I URRT are those for all plans we intend to offer in the Small Group market in the District of Columbia through Aetna Life Insurance Cmpany. The proposed rates comply with the Single Risk Pool requirements of 45 CFR §156.80(d).

## 12. Index Rate

The index rates for the experience and projection periods are set equal to the actual and projected allowed claims, respectively, less non-essential health benefits.

The index rate reflects the projected mix of business by plan. The AV pricing values for each plan are based on our internal company modeling of plan cost-sharing designs, the plan's provider network, delivery system characteristics, and utilization management practices, the impacts (as applicable) of benefits in addition to EHBs catastrophic eligibility criteria, and the distribution and administrative costs applicable to the plan/product. Rates do not differ for any characteristic other than those allowable under the regulations as described in 45 CFR 156 §156.80(d)(2).

Small Group Market Trend Adjustments: Exhibit 7 illustrates the quarterly trend factors, the resulting index rate for effective dates during each calendar quarter, the projected membership distribution by
effective date, and the weighted-average index rate. Trend factors are developed from annual forward trend and leveraging. A trend factor of 1.00 corresponds to a policy period that begins January 1, 2021.

## 13. Market-Adjusted Index Rate

Worksheet 1 illustrates the development of the Market Adjusted Index Rate. The market-wide adjustment for Risk Adjustment was discussed, previously. The risk adjustment is displayed on a paid-basis and the exchange user fee is estimated as a PMPM based on the target premium rate on Worksheet 1 of the URRT.

## 14. Plan-Adjusted Index Rates

Section 3 of Worksheet 2 illustrates the development of the Plan Adjusted Index Rates, and displays each plan-specific adjustment made to the Market Adjusted Index Rate. The 2021 Plan Adjusted Index Rates are displayed in Line 3.10. The following briefly describes how each set of adjustments was determined.
A. Actuarial Value, Cost Sharing:

The factors in Line 3.3 are the product of two separate adjustments:

1. We used internal models developed on large group claims experience to estimate the impact of different cost sharing designs. The combination of these two analyses is a projection of the relative paid to allowed ratio which also reflects the impact of out of network coverage.
2. We applied an adjustment for the impact different levels of cost sharing have on the use of medical services, which is based in part on the induced utilization factors used in the Risk Adjustment program. These adjustments are first normalized to result in an aggregate factor of 1.0 when applied to the projected 2021 membership.
B. Distribution and Administrative Costs:

Section 3 of Worksheet 2 also reflects the adjustment for projected administrative costs, including sales, marketing, any commission expense, profit, and risk. These are discussed above in the 'Non-Benefit Expenses and Profit \& Risk’ section, excluding the Risk Adjustment User Fee, and the Exchange User Fee, which are reflected in the Market-Adjusted Index Rate. These expense and profit assumptions do not vary by plan.
C. Provider Network, Delivery System, and Utilization Management:

The factors in Line 3.4 reflect the impact of differences in the network size, efficiency, and provider contract terms. We worked with our contracting area and other subject matter experts to review the impact of these differences and the expected impact on allowed claims.
D. Benefits in addition to EHBs:

The factors in Line 3.5 adjust for the impact of benefits in addition to EHBs.
E. Catastrophic Plan Eligibility:

This filing does not include catastrophic plans.
F. Experience Period Plan Adjusted Index Rates:

Worksheet 2 of the URRT displays the Plan Adjusted Index Rates filed in 2019 for the experience period.
15. Calibration
A. Age Curve Calibration:

The age factors are based on the HHS Default Standard Age curve. We then project a premium-weighted average age factor for the 2021 membership using the prescribed age curve and the projected age distribution. The calibration factor is the reciprocal of this weighted average factor.
The age that most closely corresponds to the premium weighted overall average age factor is the average age for the single risk pool.

## B. Geographic Factor Calibration:

Projected area factors are shown in Exhibit 3. Unit cost trend studies were used to evaluate whether there were significant changes to network costs that would require changes from previously filed rating area factors. The geographic calibration factor is the reciprocal of the projected average area factor
C. Tobacco Factor Calibration

We are not applying a tobacco factor in our rating.

## 16. Consumer-Adjusted Premium Rate Development

Rates are determined using the prescribed member build-up approach. In the event that a family includes more than three child dependents under age 21, only the three oldest child dependents will be considered in determining the family's premium. Additional child dependents (non-billable members) will not be included in the rate calculation.

The premium for each billable member is calculated as:
Calibrated Plan Adjusted Index Rate * Age Factor * Area Factor * Trend Factor

The resulting rate is rounded to the nearest cent, and rates are then summed for all billable family members.

An example of a contract's premium determined by the member build-up calculation is shown in Exhibit 9.

## 17. Composite Premiums

Small employers will be able to elect to have rates set using a composite approach as permitted by DC.

## 18. AV Metal Values

The AV Metal Values on Worksheet 2 were based on the AV 2021 Calculator. As applicable, entries were modified to reflect the plan appropriately and/or adjustments were made for plan design features that could not be entered in the calculator per 45 CFR Part 156, §156.135. The accompanying certification discusses how the benefits were modified to fit the parameters and the development of any adjustments. The AV screen shots provide detail on the modified entries and adjustments to AV, as applicable.

## 19. AV Pricing Values

The AV Pricing Values are calculated as the ratio of the Plan Adjusted Index Rate to the Market Adjusted Index Rate. The adjustments reflected in the AV Pricing Values are discussed in Section 15. AV Pricing Values do not differ based on morbidity differences or benefit selection anticipated within the Single Risk Pool.

## 20. Membership Projections

Exhibit A summarizes the membership distribution by plan. Membership projections on Worksheet 2 are based on historical experience, enrollment in ACA-compliant plans through January 2020, and our expectations for future sales as additional members move to these plans from grandfathered and transitional plans.

## Terminated Plans and Products

Exhibit 10 provides a plan and product crosswalk from 2019 to 2021. The crosswalk includes the list of products that have experience in the single risk pool experience period, and products that were made available in 2020 and 2021.
Consistent with the URRT instructions, experience for non-single risk pool terminated products is reported in aggregate under the terminated product with the largest membership in the experience period.

## 21. Plan Type

All plans are consistent with the plan type indicated on Worksheet 2.

## 22. Benefit Design

This filing includes one Bronze, three Silver, and four Gold plans.
Please refer to the corresponding policy forms for detailed benefit language. Exhibit A-2 provides the screenshots from the AV Calculator. All benefit and cost sharing parameters comply with DC benefit mandates and the requirements of PPACA, including preventive care benefits, deductible limits, and Actuarial Value requirements.

## 23. Marketing

Plans will be available outside of the public Marketplace. These plans may be marketed in a variety of means, including HHS Planfinder and our own website. In addition, members of our 2020 plans will be mailed a discontinuance or renewal letter, in accordance with CMS guidelines. Marketing and distribution approaches may change from time to time at management's discretion.

## 24. Underwriting

Aetna will verify applicant eligibility for these plans based on any applicable age or geographic limitations.

## 25. Renewability

These policies are guaranteed renewable as required under $\S 2703$ of the Public Health Service Act.

## 26. Company Financial Condition

As of December 31, 2019, the capital and surplus held by Aetna Life Insurance Company was approximately $\$ 3.8$ billion. This amount is disclosed in page 3 , line 37 of the Company's statutory financial statement dated December 31, 2019. The Company issues insurance nationwide for multiple lines of business including, large group medical, Small Group medical, and various non-medical products.

## Reliance

While I have reviewed the reasonableness of the assumptions and data in support of both the preparation of the Part I Unified Rate Review Template and the rate development applicable to the products discussed in this filing, I relied on the expertise of other Aetna employees, along with work products produced at their direction, for the following items:

- Experience Period MLR Rebates
- Risk Adjustment Transfer
- Actuarial Value, Modifications, and Benefit Relativities
- Supplemental EHB Pricing
- Population Risk Morbidity
- Medical Cost and Utilization Trend
- Rx Cost and Utilization Trend
- Components of Retention/Administrative Fees
- Value of Network Arrangements
- MH Net Trend
- Experience Period Data - Small Group


## Certification

While this memorandum discusses both our development of rates for these products and the completion of the Part I Unified Rate Review Template (URRT), the Part I URRT does not demonstrate the process used by Aetna to develop the rates. Rather, it represents information required by Federal regulation to be provided in support of the review of rate increases, for certification of qualified health plans for Federally-facilitated marketplaces, and for certification that the index rate is developed in accordance with Federal regulation, is used consistently, and is only adjusted by the allowable modifiers. The information provided above is intended to comply with these requirements.

I, Joanna Kluza, am an Associate of the Society of Actuaries, a member of the American Academy of Actuaries, and am qualified in the area of health insurance. I hereby certify that to the best of my knowledge and judgment:

1. This rate filing is in compliance with the applicable laws and regulations of the District of Columbia, the requirements under federal law and regulation, and all applicable Actuarial Standards of Practice, including but not limited to:
a. ASOP No. 5, Incurred Health and Disability Claims
b. ASOP No. 8, Regulatory Filings for Health Benefits, Accident and Health Insurance, and Entities Providing Health
c. ASOP No. 12, Risk Classification
d. ASOP No. 23, Data Quality
e. ASOP No. 25, Credibility Procedures Applicable to Accident and Health, Group Term Life, and Property/Casualty Coverages
f. ASOP No. 26, Compliance with Statutory and Regulatory Requirements for the Actuarial Certification of Small Employer Health Benefit Plans
g. ASOP No. 41, Actuarial Communications
h. ASOP No. 50, Determining Minimum Value and Actuarial Value under the Affordable Care Act
2. The Projected Index Rate is:
a. In compliance with all applicable State and Federal Statutes and Regulations (45 CFR 156.80(d)(1) 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, deficient, nor unfairly discriminatory.
3. 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.
4. Adjustments to the MAIR for benefits the plan offers in addition to essential health benefits included in Worksheet 2, Section III were calculated in accordance with actuarial standards of practice.
5. The geographic rating factors reflect only differences in the costs of delivery (which include unit costs and provider practice pattern differences) and do not include differences for population morbidity by geographic area.
6. 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. Adjustments made to reflect benefit features not handled by the AV Calculator are discussed in the attached certification required by 45 CFR Part 156, §156.135.


Joanna Kluza, ASA, MAAA
May 1, 2020

Aetna Life Insurance Company

## Actuarial Memorandum and Certification

## General Information

Company Identifying Information:

Company Legal Name:
State:
HIOS Issuer ID:
Market:
Effective Date:
Rate Filing Tracking Number:
Policy Form(s):
Form Filing Tracking Number:

## Aetna Life Insurance Company

District of Columbia
77422
Small Group
01/01/2021
AETN-132353171
AETN-132229307

Company Contact Information:
Name:
Telephone Number:
Email Address:


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D. Allowed and Incurred Claims Incurred During the Experience Period:

Allowed and incurred claims are sourced from our actuarial experience databases. These databases provide member-level detail on total allowed and incurred claims but do not include unit cost or utilization metrics. We allocate claims to cost categories and estimate the corresponding unit costs and utilization metrics by using an alternate reporting system that calculates unit cost and utilization metrics by medical cost category but only permits inclusion/exclusion of experience at the market and segment levels. A reconciliation of aggregate data in our actuarial experience databases is performed to ensure that data is consistent with the experience data contained in our enterprise-wide data warehouse.

Total incurred claims are developed by estimating the incurred but not reported (IBNR) reserves using aggregate block of business paid claims. Paid claims are adjusted using the IBNR completion factors. More specifically, historical claim payment patterns are used to predict the ultimate incurred claims for each date-of-service month. The IBNR is estimated using actuarial principles and assumptions which consider historical claim submission and adjudication patterns, unit cost and utilization trends, claim inventory levels, changes in membership and product mix, seasonality, and other relevant factors including a review of large claims. This same process is used to develop IBNR estimates for allowed claims.

As noted above, the experience period reflects one month of paid claim run-off.

## 4. Benefit Categories

Our internal systems assign claims to several benefit categories. We have mapped these categories to the categories described in the Unified Rate Review Instructions released in April 2020. Inpatient Hospital consists of care delivered at an inpatient facility and associated expenses, including day-based mental health services. Outpatient Hospital includes outpatient surgical, outpatient mental health, and emergency care and associated expenses. Professional includes both specialty physician and primary care physician expenses, including office-based mental health services. Other includes dental, home health care, medical pharmacy expenses, laboratory expenses, and radiology expenses. Non-capitated ambulance is included in the Outpatient Hospital category when billed by the facility and included in Specialist Physician otherwise. Prescription Drug includes drugs dispensed by a pharmacy.

The utilization for these services are counted by service type, and aggregated for each benefit category. Inpatient Hospital utilization is counted as days; Outpatient Hospital, Professional, and Other Medical utilization are counted as visits. Prescription Drug utilization is counted per script.

## 5. Projection Factors

A. Changes in the Morbidity of the Population Insured:

The experience period data includes experience for community-rated policies issued to small employers in 2019.

We also considered the expected morbidity of the DC small group ACA population and the likely population that will be covered by Small Group Single Risk Pool policies in 2021 and have adjusted our projections for this morbidity change accordingly.

## B. Plan Design Changes:

The products included in this filing include benefits necessary to comply with the Essential Health Benefit requirements. The experience data includes experience for Single Risk Pool products that have essentially identical benefits and coverage issued outside the Single Risk Pool which does not cover all EHBs. The projection factor reflects the pro-rated impact of these additional benefits, as well as any changes in 2021 State Benchmark EHBs, and newly mandated benefits.

The change in projected utilization due to changes in benefits is also considered. As cost sharing decreases (measured by increasing Actuarial Value), utilization increases. This pattern is reflected in the factors that are built into the federal risk adjustment mechanism that started in 2014. The federal risk adjustment program factors and other proprietary models were considered in the development of the utilization change. The average cost sharing in the experience period was compared with the average cost sharing in the projection period. From the average cost sharing change, an expected utilization change was derived.
C. Changes in Demographics:

Experience data was normalized for projected changes in the age/gender mix and area mix using internally-developed factors. Exhibits 2 and 3 contain detail on the calculations of the impact of demographic mix shifts.
D. Other Adjustments:

The 'Other' adjustment includes the projected impact of changes in network composition and provider contracts, expected morbidity changes, changes in benefits, and changes in demographics.
E. Trend Factors (Cost/Utilization):

6. Manual Rate Adjustments:
A. Source and Appropriateness of Experience Data Used:

B. Adjustments Made to the Data:

C. Inclusion of Capitation Payments:

7. Credibility of Experience

8. Risk Adjustment
A. Risk Adjustment - Experience Period

B. Risk Adjustment - Projection Period

9. Non-Benefit Expenses and Profit \& Risk

Actual general and administrative expenses are based on historical corporate Small Group market expense levels, 2021 projections, and projected changes in expenses, inflation, and membership for 2021 for our National book of Small Group business.

A flat commission per policy per month will be paid to all brokers in DC during open enrollment. Commissions do not vary by plan.

Federal taxes include PPACA Taxes and Fees are based on the Notice of Benefit and Payment Parameters for 2021, as well as Federal income tax and State Premium taxes. State premium taxes are estimated on most current known levels and include any known assessments.
10. Projected Loss Ratio


## 11. Single Risk Pool

The plans and rates included in the Part I URRT are those for all plans we intend to offer in the Small Group market in the District of Columbia through Aetna Life Insurance Cmpany. The proposed rates comply with the Single Risk Pool requirements of 45 CFR §156.80(d).

## 12. Index Rate

The index rates for the experience and projection periods are set equal to the actual and projected allowed claims, respectively, less non-essential health benefits.

The index rate reflects the projected mix of business by plan. The AV pricing values for each plan are based on our internal company modeling of plan cost-sharing designs, the plan's provider network, delivery system characteristics, and utilization management practices, the impacts (as applicable) of benefits in addition to EHBs catastrophic eligibility criteria, and the distribution and administrative costs applicable to the plan/product. Rates do not differ for any characteristic other than those allowable under the regulations as described in 45 CFR 156 §156.80(d)(2).

Small Group Market Trend Adjustments:

14. Plan-Adjusted Index Rates

A. Actuarial Value, Cost Sharing:

B. Distribution and Administrative Costs:

C. Provider Network, Delivery System, and Utilization Management:

D. Benefits in addition to EHBs:
E. Catastrophic Plan Eligibility:

This filing does not include catastrophic plans.
F. Experience Period Plan Adjusted Index Rates:

Worksheet 2 of the URRT displays the Plan Adjusted Index Rates filed in 2019 for the experience period.
15. Calibration
A. Age Curve Calibration:


## B. Geographic Factor Calibration:


C. Tobacco Factor Calibration

We are not applying a tobacco factor in our rating.
16. Consumer-Adjusted Premium Rate Development

Rates are determined using the prescribed member build-up approach. In the event that a family includes more than three child dependents under age 21, only the three oldest child dependents will be considered in determining the family's premium. Additional child dependents (non-billable members) will not be included in the rate calculation.

The premium for each billable member is calculated as:
Calibrated Plan Adjusted Index Rate * Age Factor * Area Factor * Trend Factor
The resulting rate is rounded to the nearest cent, and rates are then summed for all billable family members.

## 17. Composite Premiums

Small employers will be able to elect to have rates set using a composite approach as permitted by DC.

## 18. AV Metal Values

The AV Metal Values on Worksheet 2 were based on the AV 2021 Calculator. As applicable, entries were modified to reflect the plan appropriately and/or adjustments were made for plan design features that could not be entered in the calculator per 45 CFR Part 156, §156.135. The accompanying certification discusses how the benefits were modified to fit the parameters and the development of any adjustments. The AV screen shots provide detail on the modified entries and adjustments to AV, as applicable.

## 19. AV Pricing Values

The AV Pricing Values are calculated as the ratio of the Plan Adjusted Index Rate to the Market Adjusted Index Rate. The adjustments reflected in the AV Pricing Values are discussed in Section 15. AV Pricing Values do not differ based on morbidity differences or benefit selection anticipated within the Single Risk Pool.
20. Membership Projections


## Terminated Plans and Products

Exhibit 10 provides a plan and product crosswalk from 2019 to 2021. The crosswalk includes the list of products that have experience in the single risk pool experience period, and products that were made available in 2020 and 2021.
Consistent with the URRT instructions, experience for non-single risk pool terminated products is reported in aggregate under the terminated product with the largest membership in the experience period.

## 21. Plan Type

All plans are consistent with the plan type indicated on Worksheet 2.

## 22. Benefit Design

This filing includes one Bronze, three Silver, and four Gold plans.

Please refer to the corresponding policy forms for detailed benefit language. Exhibit A-2 provides the screenshots from the AV Calculator. All benefit and cost sharing parameters comply with DC benefit mandates and the requirements of PPACA, including preventive care benefits, deductible limits, and Actuarial Value requirements.

## 23. Marketing

Plans will be available outside of the public Marketplace. These plans may be marketed in a variety of means, including HHS Planfinder and our own website. In addition, members of our 2020 plans will be mailed a discontinuance or renewal letter, in accordance with CMS guidelines. Marketing and distribution approaches may change from time to time at management's discretion.

## 24. Underwriting

Aetna will verify applicant eligibility for these plans based on any applicable age or geographic limitations.
25. Renewability

These policies are guaranteed renewable as required under §2703 of the Public Health Service Act.

## 26. Company Financial Condition



Reliance
While I have reviewed the reasonableness of the assumptions and data in support of both the preparation of the Part I Unified Rate Review Template and the rate development applicable to the products discussed in this filing, I relied on the expertise of other Aetna employees, along with work products produced at their direction, for the following items:



## Certification

While this memorandum discusses both our development of rates for these products and the completion of the Part I Unified Rate Review Template (URRT), the Part I URRT does not demonstrate the process used by Aetna to develop the rates. Rather, it represents information required by Federal regulation to be provided in support of the review of rate increases, for certification of qualified health plans for Federally-facilitated marketplaces, and for certification that the index rate is developed in accordance with Federal regulation, is used consistently, and is only adjusted by the allowable modifiers. The information provided above is intended to comply with these requirements.
, am an
, and am qualified in the area of health insurance. I hereby certify that to the best of my knowledge and judgment:

1. This rate filing is in compliance with the applicable laws and regulations of the District of Columbia, the requirements under federal law and regulation, and all applicable Actuarial Standards of Practice, including but not limited to:
a. ASOP No. 5, Incurred Health and Disability Claims
b. ASOP No. 8, Regulatory Filings for Health Benefits, Accident and Health Insurance, and Entities Providing Health
c. ASOP No. 12, Risk Classification
d. ASOP No. 23, Data Quality
e. ASOP No. 25, Credibility Procedures Applicable to Accident and Health, Group Term Life, and Property/Casualty Coverages
f. ASOP No. 26, Compliance with Statutory and Regulatory Requirements for the Actuarial Certification of Small Employer Health Benefit Plans
g. ASOP No. 41, Actuarial Communications
h. ASOP No. 50, Determining Minimum Value and Actuarial Value under the Affordable Care Act
2. The Projected Index Rate is:
a. In compliance with all applicable State and Federal Statutes and Regulations (45 CFR 156.80(d)(1) 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, deficient, nor unfairly discriminatory.
3. 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.
4. Adjustments to the MAIR for benefits the plan offers in addition to essential health benefits included in Worksheet 2, Section III were calculated in accordance with actuarial standards of practice.
5. The geographic rating factors reflect only differences in the costs of delivery (which include unit costs and provider practice pattern differences) and do not include differences for population morbidity by geographic area.
6. 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. Adjustments made to reflect benefit features not handled by the AV Calculator are discussed in the attached certification required by 45 CFR Part 156, §156.135.

May 1, 2020
Date

# Aetna Life Insurance Company <br> D.C. Small Group <br> PPO Products 

## Summary

Aetna Life Insurance Company has filed 2021 premium rates for small group plans in the District of Columbia.

## Who is affected?

Policies that renew in 2021 in the following products will be affected:
Product Name: Aetna Life Insurance Company
\# Current Members: 779
Range of Increases: $36.39 \%$ to $43.58 \%$, $38.04 \%$ Average
2021 Premium rates for members in the above products will increase by $36.39 \%$ to $43.58 \%$, in plans listed for Aetna Preferred Provider Organization. Increases are determined by the member's plan and rating area in which they are located.

## Why We Need to Increase Premiums

In 2019, Aetna’s financial results were worse than the level required for long-term stability in the Small Group market.

Medical costs are going up and we are changing our rates to reflect this increase. We expect medical costs to go up $10.2 \%$. Medical costs go up mainly for two reasons - providers raise their prices and members get more medical care.

For Small Employers in the District of Columbia, some examples of increasing medical costs we have experienced in the last 12 months include:

- The cost for an inpatient hospital admission has increased $5.6 \%$
- The cost for pharmacy prescriptions have gone up $9.7 \%$
- Use for physician service has increased $7.0 \%$


## What Else Affects Our Request to Increase Premiums

Changes to cost-sharing for some plans were made to comply with the actuarial value requirements or make our plans more attractive to consumers. This increases costs by up to $1.1 \%$.

Our estimate of average population health and the expected risk adjustment transfers for Affordable Care Act (ACA) products have changed to reflect new data on market average premiums and population health. Small groups purchasing insurance in the market place are sicker than we initially anticipated. Population risk is also affected by the movement of business between the ACA market and other options as well as among other carriers in the marketplace. These changes are expected to increase costs by 9.7\%.

Claims experience for this market has been worse than anticipated. Part of the rate increase is needed to ensure that we can continue to offer coverage in this market.

## Will Premiums for All Individuals Increase 38.04\%?

No, increases differ by plan. The exact rate change will depend on what benefit plan the individual chooses, when the member's group contract renews, and the age and family size for enrolling employees. Rates charged to employees also depend upon any change in the amount of premium paid by the employer.

## How does this request align to Minimum Loss Ratio Requirements (MLR)?

These rates are expected to produce an MLR equal to or above the $80 \%$ requirement for small group business. Under the ACA, at least $80 \%$ of the premiums collected by health plans are expected to pay for medical care and activities that improve health care quality for members. If the actual MLR turns out to be less than $80 \%$, rebates will be issued to members in accordance with the law.

Aetna makes significant investments that benefit our members that the government does not allow us to use in this calculation. These investments include customer service, health quality activities like disease management programs, and the development of new information technologies.

## What is Aetna doing to keep premiums affordable?

Aetna is taking a number of steps to keep our products as affordable as possible and to address the underlying cost of health care. These actions include:

- Developing new agreements, arrangements, and partnerships with health care providers that base provider compensation on the quality of care.
- Creating medical management programs that address potential health issues for members earlier, improving health outcomes and reducing the need for high-cost health care services.
- Working to reduce the ability of out-of-network providers to collect unreasonably excessive payments for services they provide.

Aetna is dedicated to increasing transparency within the health care system and helping members best utilize the plans that they have. Members can access Aetna Navigator, a secure member website, which allows them to research their specific plan benefits, health care providers in a given area, and in some locations, the cost of certain health care services. The Aetna Navigator streamlined mobile app is also available to allow members to take their care on the go.

May 1, 2020
Mr. Efren Tanhehco
Supervising Actuary
District of Columbia Department of Insurance \& Securities Regulation
810 First Street NE, $6{ }^{\text {th }}$ Floor
Washington, DC 20002
Subject: Aetna Life Insurance Company - NAIC Number 60054 Small Group Premium Rate Filing - DC On Exchange Effective dates January 1, 2021 - December 31, 2021

Dear Mr. Tanhehco:
I am writing to request approval of the attached Rate Filing for plans offered to Small Groups by Aetna Life Insurance Company sold on the DC Exchange. This filing is for effective dates January 1, 2021 - December 31, 2021. This filing contains the benefit plans and rating methodology. The average rate revision proposed is an increase of 38.04\%.

The requested rates have been developed incorporating consideration of the market changes and rating requirements taking effect in the Small Group Market and conforms to the benefit plan provisions required by the Patient Protection and Affordable Care Act (P.L. 111-148) of 2010. Additionally, these health benefit plans conform to each respective tier of coverage, defined as Bronze, Silver, and Gold.

This filing is for Aetna's Small Group PPO Medical Expense coverage.
The following supporting documentation is also included:

1) An Actuarial Certification
2) An Actuarial Memorandum including supporting exhibits and documentation

The forms filing has been submitted under separate cover and the SERFF Filing ID \# is AETN132229307.

The purpose of this rate filing is to comply with regulatory rate filing requirements. This filing is not intended to be used for other purposes. If you need additional information, please contact me by telephone at (860) 273-8566, or via e-mail at MurayiR@aetna.com.

Sincerely,


Regis B. Murayi

## Certificate Form Names and Numbers

| Form Name | Form Number |
| :--- | :--- |
| AL DC SG HHIXCOC V005 | AL SG HCOC-2021-EPO 05-HIX |
| AL DC HGrpAg V003 | AL HGrpPol 03 |

## Schedule Form Names and Numbers

| Form Name | Form Number |
| :--- | :--- |
| AL DC SG-HIXSOB-14045159 V005 | AL SG-SOB-EPO-14045159 05-HIX |
| AL DC SG-HIXSOB-14045160 V005 | AL SG-SOB-EPO-14045160 05-HIX |
| AL DC SG-HIXSOB-14045161 V005 | AL SG-SOB-EPO-14045161 05-HIX |
| AL DC SG-HIXSOB-14045163 V005 | AL SG-SOB-EPO-14045163 05-HIX |
| AL DC SG-HIXSOB-14045165 V005 | AL SG-SOB-EPO-14045165 05-HIX |
| AL DC SG-HIXSOB-14045167 V005 | AL SG-SOB-EPO-14045167 05-HIX |
| AL DC SG-HIXSOB-14045169 V005 | AL SG-SOB-EPO-14045169 05-HIX |
| AL DC SG-HIXSOB-14045171 V005 | AL SG-SOB-EPO-14045171 05-HIX |



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## Rate Filing Justification Part II (Plain Language Summary)

Pursuant to 45 CFR 154.215, health insurance issuers are required to file Rate Filing Justifications. Part II of the Rate Filing Justification for rate increases and new submissions must contain a written description that includes a simple and brief narrative describing the data and assumptions that were used to develop the proposed rates. The Part II template below must be filled out and uploaded as an Adobe PDF file under the Consumer Disclosure Form section of the Supporting Documentation tab.

Name of Company Aetna Life Insurance Company
SERFF tracking number AETN-132353171
Submission Date May 1,2020
Product Name DC ALIC PPO SG 2021
$\begin{array}{lll}\text { Market Type } & \bigcirc \text { Individual } & \bigcirc \text { Small Group } \\ \text { Rate Filing Type } & \bigcirc \text { Rate Increase } & \bigcirc \text { New Filing }\end{array}$

## Scope and Range of the Increase:

The $38.0 \%$ increase is requested because:
Rates are updated to reflect the impact of medical trend, revisions to our assumptions about population morbidity and projected population, changes in cost sharing levels to ensure compliance with Actuarial Value requirements, and changes in provider networks and contracts.

This filing will impact:
\# of policyholder's 285 \# of covered lives 444
The average, minimum and maximum rate changes increases are:

- Average Rate Change: The average premium change, by percentage, across all policy holders if the filing is approved 38.0 \%
- Minimum Rate Change: The smallest premium increase (or largest decrease), by percentage, that any one policy holder would experience if the filing is approved $36.3 \%$
- Maximum Rate Change: The largest premium increase, by percentage, that any one policy holder would experience if the filing is approved $43.5 \%$

Individuals within the group may vary from the aggregate of the above increase components as a result of:
The benefit plan the individual chooses, when the member's group contract renews, the age and family size and age for enrolling employees and employer contributions.

## Financial Experience of Product

The overall financial experience of the product includes:
The 2019 experience generated by the plans offered under this product produced a loss ratio that was unfavorable to the target loss ratio before and after risk adjustment. Due to the low volume of members that have enrolled in these plans the 2019 experience is not credible.

The rate increase will affect the projected financial experience of the product by:
The rate revision is not expected to impact the profitability of the product. That is, the target profit margin is unchanged

## Components of Increase

The request is made up of the following components:
Trend Increases - $34.1 \%$ of the $38.0 \%$ total filed increase

1. Medical Utilization Changes -Defined as the increase in total plan claim costs not attributable to changes in the unit cost of underlying services, or renegotiation of provider contracts. Examples include changes in the mix of services utilized, or an increase/decrease in the frequency of service utilization.

This component is $18.9 \%$ of the $38.0 \%$ total filed increase.
2. Medical Price Changes - Defined as the increase in total plan claim costs attributable to changes in the unit cost of underlying services, or renegotiation of provider contracts.

This component is $15.2 \%$ of the $38.0 \%$ total filed increase.
Other Increases - $65.8 \%$ of the $38.0 \%$ total filed increase

1. Medical Benefit Changes Required by Law - Defined as any new mandated plan benefit changes, as mandated by either State or Federal Regulation.

This component is $2.51 \%$ of the $38.0 \%$ total filed increase.
2. Medical Benefit Changes Not Required by Law - Defined as changes in plan benefit design made by the company, which are not required by either State or Federal Regulation.

This component is 0 \% of the $38.0 \%$ total filed increase.
3. Changes to Administration Costs - Defined as increases in the costs of providing insurance coverage. Examples include claims payment expenses, distribution costs, taxes, and general business expenses such as rent, salaries, and overhead.

This component is $0.44 \%$ of the $38.0 \%$ total filed increase.
4. Changes to Profit Margin - Defined as increases to company surplus or changes as an additional margin to cover the risk of the company.

This component is $0.0 \%$ of the $38.0 \%$ total filed increase.
5. Other - Defined as:

Changes in commission, benefit slope, risk adjustment, provider contracting, experience and population risk.

This component is $62.8 \%$ of the $38.0 \%$ total filed increase.

| State: | DC |
| :--- | :---: |
| Plan Year: | 2021 |
| HIOS Issuer ID: | 77422 |
| HIOS Product Ids: | 77422 DC011 |

## HIOS Plan Ids: 77422DC0110006 77422DC0110008 77422DC0110001

Per 156.135, the AV must be certified by a member of the American Academy of Actuaries using generally accepted actuarial principles and methodologies. There are 3 types of certification:
(1) Option 1 - Certify that the plan was entered correctly and does not vary materially from standard options entered
(2) Option 2 - Certify that entries into the calculator were modified to reflect the plan appropriately [156.135.(b).(2)]
(3) Option 3 - Used the calculator for provisions that fit and made adjustment for plan design features that deviate outside of calculator [156.135.(b).(3) ]

The plans listed meet the criteria for Option 1 - the plans were entered correctly and do not vary materially from the standard options entered.
In addition, a 0.9999 factor is applied to the average coinsurance in row 11 for most plans. While not materially impacting the entered benefit value, this methodology prevents the OP facility/physician splitting methodology from being invoked which we do not believe is appropriate for our benefit plans.
The output from this consistently-applied process reflects our certified Actuarial Values.

## Certification Language:

The development of the actuarial value was determined in accordance with the ASOPs established by the ASB and with applicable laws and regulations.
This analysis was conducted by a member of the American Academy of Actuaries that meets the Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States promulgated by the American Academy of Actuaries, and has the education and experience necessary to perform the work.

The certifying actuary is an employee of Aetna.
This certification supports plans offered in the Small Group market

Metal levels were appropriately assigned based on applicable law.

Actuary Signature:
Actuary Printed name: Joanna Kluza, ASA, MAAA
Date:
Joanna Kluza, ASA, MAAA
4/29/2020

| State: | DC |
| :--- | ---: |
| Plan Year: | 2021 |

Plan Year:
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1) Justification for use of Issuer AV:

Per 156.135 , the $A V$ must be certified by a member of the American Academy of Actuaries using generally accepted actuarial principles and methodologies. There are 3 types of certification:
(1) Option 1 - Certify that the plan was entered correctly and does not vary materially from standard options entered
(2) Option 2 - Certify that entries into the calculator were modified to reflect the plan appropriately [156.135.(b).(2)]
(3) Option 3 - Used the calculator for provisions that fit and made adjustment for plan design features that deviate outside of calculator [156.135.(b).(3)]

Aetna benefit plans were analyzed vs the AVC to determined when Option 2 and/or Option 3 vs Option 1 certification was necessary. Four underlying calculators were built to support population of the Mental Health OP Specialist OV, ER, and Rx generic rows in the AVC. These all support Option 2 certifications, but only the calculators used are referenced below. A separate calculator was used for plans with True Individual Family (TIF) deductibles in support of Option 3. Again, only if the calculator was used would it be referenced below. In addition, a 0.9999 factor is applied to the average coinsurance in row 11 for most plans. While not materially mpacting the entered benefit value, this methodology prevents the OP facility/physician splitting methodology from being invoked which we do not believe is appropriate for our benefit plans. The output from this consistentlyapplied process reflects our certified Actuarial Values.
2) Regulatory permitted alternate method used:
(2) Option 2 - Certify that entries into the calculator were modified to reflect the plan appropriately [156.135.(b).(2)]

$$
\begin{aligned}
& \text { 77422DC0110005 } \\
& \text { 77422DC0110004 } \\
& \text { 77422DC0110007 } \\
& \text { 77422DC0110002 }
\end{aligned}
$$

(3) Option 3 - Used calculator for provisions that fit and made adjustment for plan design features that deviate outside of calculator [156.135.(b).(3)]

77422DC0110003
3) Confirmation that only in-network cost sharing including multitier networks, was considered:

Confirmed. Only in-network cost sharing information was used.
4) Description of standardized plan population data used:

Detail of data used for each of the subcalculators is described below in items 5 \& 6 . All data was based on either the AVC continuance tables, or a national data set which is representative of the SG population

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

## MH OP Benefit Plan Fit Process

MH OP has two subcategories: MH OP - Office Visit and MH OV - All Other. The equivalent coinsurance for each was set as the plan copay divided by the unit cost. The adjusted equivalent coinsurance was then calculated for each copay/deductible combination. If there was non-uniform deductible applicability, the equivalent coinsurance was calculated that produced the same net impact as assuming both subcategories had no deductible applie This was based on the distribution of claims cost from the AVC continuance tables, adjusted to take into account the impact of the OOP Max. The average coinsurance of the row was calculated based on the weightings of the internal subcategories. This coinsurance was then converted to a copay based on the average unit cost from the aforementioned continuance tables.

## ER Benefit Plan Fit Process

Where both an ER copay and coinsurance exist, we calculated a coinsurance equivalent amount. The copay visit costs were converted to equivalent coinsurance using the AVC continuance table average unit costs. The copay equivalent coinsurance was then multiplied by the actual coinsurance as the aggregate equivalent coinsurance.

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

TIF (True individual family) Deductible
For plans with a TIF deductible, the average change in paid to allowed due to this feature was determined based on internal cost data and a SG appropriate distribution of single vs family members. That process produces an additive adjustment to the AV obtained via the methodology described above in support of 156.135.(b).(2) certifications.

## Certification Language

The development of the actuarial value was determined in accordance with the ASOPs established by the ASB and with applicable laws and regulations.
This analysis was conducted by a member of the American Academy of Actuaries that meets the Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States promulgated by the American Academy of Actuaries, and has the education and experience necessary to perform the work.

The certifying actuary is an employee of Aetna.
This certification supports plans offered in the Small Group market.

Metal levels were appropriately assigned based on applicable law.

Actuary Signature:
Actuary Printed name: Joanna Kluza, ASA, MAAA
Date:

## RATE FILING REQUIREMENTS INDIVIDUAL AND SMALL GROUP PLANS SOLD ON DC HEALTH LINK CHECK-LIST

INSTRUCTIONS: Include all required elements in the table below with the filed rates. The data elements listed in the Actuarial

| Number | Data Element | Requirement Description | Individual and Small Group |  |
| :---: | :---: | :---: | :---: | :---: |
|  |  |  | Has the Data Element Been Included? | Location of the Data Element |
| 1 | Purpose of Filing | State the purpose of the filing. Identify the applicable law. List the proposed changes to the base rates and rating factors, and provide a general summary. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 1 |
| 2 | Form Numbers | Form numbers should be listed in the actuarial memorandum. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 11 |
| 3 | HIOS <br> Product ID | The HIOS product ID should be listed in the actuarial memorandum. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 1 |
| 4 | Effective Date | The requested effective date of the rate change. For filings effective $1 / 1 / 2017$ and later, follow filing due date requirements. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 1 |
| 5 | Market | Indicate whether the products are sold in the individual or small employer group market. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 1 |
| 6 | Status of Forms | Indicate whether the forms are open to new sales, closed, or a mixture of both, and whether the forms are grandfathered, non- grandfathered, or a mixture of both. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 1 |
| 7 | Benefits/Metal level(s) | Include a basic description of the benefits of the forms referenced in the filing and the metal level of each plan design. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 1-2 |
| Number | Data Element | Requirement Description | Individual and Small Group |  |
|  |  |  | Has the Data Element Been Included? | Location of the Data Element |
| 7.1 | AV Value | Provide the actuarial value of each plan design using the AV calculator developed and made available by HHS. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 1-2, Exhibit A |
| 8 | Average Rate Increase Requested | The weighted average rate increase being requested, incremental and year-over-year renewal. The weights should be based on premium volume. In the small group market, please also provide weighted average rate increase requested for 2016Q1 over 2015Q1; etc. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 2 |
| 9 | Maximum Rate Increase Requested | The maximum rate increase that could be applied to a policyholder based on changes to the base rate and rating factors, incremental and year-over-year renewal. (Does not include changes in the demographics of the covered members.) | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 2 |
| 10 | Minimum Rate Increase Requested | The minimum rate increase that could be applied to a policyholder based on changes to the base rate and rating factors, incremental and year-over-year renewal. (Does not include changes in the demographics of the covered members.) | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 2 |
| 11 | Absolute Maximum Premium Increase | The absolute maximum year-over-year renewal rate increase that could be applied to a policyholder, including demographic changes such as aging. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 2 |
| 12 | Average Renewal Rate Increase for a Year | Calculate the average renewal rate increase, weighted by written premium, for renewals in the year ending with the effective period of the rate filing. The calculation must be performed for each HIOS product ID. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 2 |


| Number | Data Element | Requirement Description | Individual and Small Group |  |
| :---: | :---: | :---: | :---: | :---: |
|  |  |  | Has the Data Element Been Included? | Location of the Data Element |
| 13 | Rate Change History | Rate change history of the forms referenced in the filing. If nationwide experience is used in developing the rates, provide separately the rate history for District of Columbia and the nationwide average rate history. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 2 |
| 14 | Exposure | Current number of policies, certificates and covered lives. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 3 |
| 15 | Member Months | Number of members in force during each month of the base experience period used in the rate development and in each of the two preceding twelve-month periods. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 3 |
| 16 | Past Experience | Provide monthly earned premium and incurred claims for the base experience period used in the rate development and each of the two preceding twelve-month periods. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 3, 10 |
| 17 | Index Rate | Provide the index rate. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 3 |
| 17.1 | Rate Development | Show base experience used to develop rates and all adjustments and assumptions applied to arrive at the requested rates. For less than fully credible blocks, disclose the source of the base experience data used in the rate development and discuss the appropriateness of the data for pricing the policies in the filing. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 3-5 |
| 18 | Credibility Assumption | If the experience of the policies included in the filing is not fully credible, state and provide support for the credibility formula used in the rate development. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 5 |
| 19 | Trend Assumption | Show trend assumptions by major types of service as defined by HHS in the Part I Preliminary Justification template, separately by unit cost, utilization, and in total. Provide the development of the trend assumptions. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 5 |
| 20 | Cost-Sharing Changes | Disclose any changes in cost sharing for the plans between the base experience period for rating and the requested effective date. Show how the experience has been adjusted for cost- sharing changes in the rate development. Provide support for the estimated cost impact of the cost-sharing changes. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 6 |
| 21 | Benefit Changes | Disclose any changes in covered benefits for the plans between the base experience period for rating and the requested effective date. Show how the experience has been adjusted for changes in covered benefits in the rate development. Provide support for the estimated cost impact of the benefit changes. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 6 |


| Number | Data Element | Requirement Description | Individual and Small Group |  |
| :---: | :---: | :---: | :---: | :---: |
|  |  |  | Has the Data Element Been Included? | Location of the Data Element |
| 22 | Plan Relativities | For rate change filings, if the rate change is not uniform for all plan designs, provide support for all requested rate changes by plan design. Disclose the minimum, maximum, and average impact of the changes on policyholders. <br> For initial filings, provide the derivation of any new plan factors. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 6 |
| 23 | Rating Factors | Provide the age and other rating factors used. Disclose any changes to rating factors, and the minimum, maximum, and average impact on policyholders. Provide support for any changes. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 6, Exhibit 3, Exhibit 7, Exhibit 11 |
| 23.1 | Wellness Programs | Describe any wellness programs (as defined in section 2705(j) of the PHS Act) included in this filing. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 7 |
| 24 | Distribution of Rate Increases | Anticipated distribution of rate increases due to changes in base rates, plan relativities, and rating factors. This need not include changes in demographics of the individual or group. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 7, Exhibit A-1 |
| 25 | Claim Reserve Needs | Provide the claims for the base experience period separately for paid claims, and estimated incurred claims (including claim reserve). Indicate the incurred period used for the base period. Indicate the paidthrough date of the paid claims, and provide a basic description of the reserving methodology for claims reserves and contract reserves, if any. Provide margins used, if any. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 7 |
| 26 | Administrative Costs of Programs that Improve Health Care Quality | Show the amount of administrative costs included with claims in the numerator of the MLR calculation. Show that the amount is consistent with the most recently filed Supplemental Health Care Exhibit or provide support for the difference. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 7 |
| Number | Data Element | Requirement Description | Individual/and Small Group |  |
|  |  |  | Has the Data Element Been Included? | Location of the Data Element |
| 27 | Taxes and Licensing or Regulatory Fees | Show the amount of taxes, licenses, and fees subtracted from premium in the denominator of your medical loss ratio calculation(c). Show that the amount is consistent with the most recently filed Supplemental Health Care Exhibit or provide support for the difference. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 7, Exhibit 6 |
| 28 | Medical Loss Ratio (MLR) | Demonstrate that the projected loss ratio, including the requested rate change, meets the minimum MLR. Show the premium, claims, and adjustments separately with the development of the projected premium and projected claims (if not provided in the rate development section). If the loss ratio falls below the minimum for the subset of policy forms in the filing, show that when combined with all other policy forms in the market segment in District of Columbia, the loss ratio meets the minimum. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 7, Exhibit 6 |


| Number | Data Element | Requirement Description | Individual and Small Group |  |
| :---: | :---: | :---: | :---: | :---: |
|  |  |  | Has the Data Element Been Included? | Location of the Data Element |
| 29 | Risk Adjustment | Provide rate information relating to the Risk Adjustment program. Information should include assumed Risk Adjustment user fees, Risk Adjustment PMPM excluding user fees and assumed distribution of enrollment by risk score, plan, and geographical area. Provide support for the assumptions, including any demographic changes. Provide information/study on the development of risk scores and Risk Adjustment PMPM. Provide previous year-end estimated risk adjustment payable or receivable amount and quantitative support for the amount. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 8 |
| 30 | Past and Prospective Loss Experience Within and Outside the State | Indicate whether loss experience within or outside the state was used in the development of proposed rates. Provide an explanation for using loss experience within or outside the state. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 8 |
| 31 | A Reasonable Margin for Reserve Needs | Show the assumed Margin for Reserve Needs used in the development of proposed rates. Margin for Reserve Needs includes factors that reflect assumed contributions to the company's surplus or the assumed profit margin. Demonstrate how this assumption was derived, how the assumption has changed from prior filings, and provide support for changes. If the assumption for Qualified Health Plans exceeds $3 \%$ as assumed in the risk corridor formula, justify the excess in light of the company's surplus position. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 8, Exhibit 5 |
| Number | Data Element | Requirement Description | Individual and Small Group |  |
|  |  |  | Has the Data Element Been Included? | Location of the Data Element |
| 32 | Past and Prospective Expenses | Indicate the expense assumptions used in the development of proposed rates. Demonstrate how this assumption was derived. Show how this assumption has changed from prior filings, and provide support for any change. <br> Provide the assumed administrative costs in the following categories: <br> - Salaries, wages, employment taxes, and other employee benefits <br> - Commissions <br> - Taxes, licenses, and other regulatory fees <br> - Cost containment programs / quality improvement activities <br> - All other administrative expenses <br> - Total | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 8 |
| 33 | Any Other Relevant Factors Within and Outside the State | Show any other relevant factors that have been considered in the development of the proposed rates. Demonstrate how any related assumptions were derived. Show how these assumptions have changed from prior filings, and provide support for any change. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 8 |
| 34 | Other | Any other information needed to support the requested rates or to comply with Actuarial Standard of Practice No. 8. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 9 |


| Number | Data Element | Requirement Description | Individual and Small Group |  |
| :---: | :---: | :---: | :---: | :---: |
|  |  |  | Has the Data Element Been Included? | Location of the Data Element |
| 35 | Actuarial Certification | Signed and dated certification by a qualified actuary that the anticipated loss ratio meets the minimum requirement, the rates are reasonable in relation to benefits, the filing complies with the laws and regulations of the District of Columbia and all applicable Actuarial Standards of Practice, including ASOP No. 8, and that the rates are not unfairly discriminatory. | Yes | DC Small Group Actuarial Memorandum ALIC 1Q21.doc - pg 9 |
| 36 | Part I Preliminary <br> Justification (Grandfathered <br> Plan Filings) | Rate Summary Worksheet --- Provide this document with all Grandfathered plan filings. Provide in Excel and PDF format. | N/A | N/A |
| 36.1 | $\begin{aligned} & \hline \text { Unified Rate Review } \\ & \text { Template (Non- } \\ & \text { Grandfathered Filings) } \end{aligned}$ | Unified Rate Review Template as specified in the proposed Federal Rate Review regulation. Provide this document with all NonGrandfathered plan filings. Provide in Excel and PDF format. | Yes | Supporting Documentaion |
| 37 | Part II Preliminary Justification | Written description justifying the rate increase as specified by 45 CFR § 154.215(f). Provide for all individual and small employer group filings (whether or not they are "subject to review" as defined by HHS). | Yes | Supporting Documentation |
| 38 | DISB Actuarial Memorandum Dataset | Summarizes data elements contained in Actuarial Memorandum. Provide this document with all Non-Grandfathered plan filings. Provide in Excel format only. | Yes | Supporting Documentation |
| 39 | District of Columbia Plain Language Summary | Similar to the Part II Preliminary Justification, this is a written description of the rate increase as specified by 45 CFR § 154.215, but as a simple and brief narrative describing the data and assumptions that were used to develop the proposed rates. Provide this document for all individual and small employer group filings. | Yes | Supporting Documentation |
| 40 | Summary of Components for Requested Rate Change | DISB will require that issuers provide a chart listing a) any and all components of requested rate changes from the prior year; b) a quick summary/explanation of the change; and c) the actual percentage impact of the change for each component, such that the total for all components listed equals the total percentage change requested for the plan year. | Yes | Supporting Documentation |


| Number | Data Element | Requirement Description | Individual and Small Group |  |
| :---: | :---: | :---: | :---: | :---: |
|  |  |  | Has the Data Element Been Included? | Location of the Data Element |
| 41 | CCIIO Risk Adjustment Transfer Elements Extract (RATE 'E') | Received directly from CCIIO; this report should be completed and submitted by the set deadline for QHP submissions, or by April 30th of the current year, whichever is first. | Yes | Supporting Documentation |
| 42 | Additional Requirements for Stand-Alone Dental Plan Filings | Provide the following for stand-alone dental plan filings: <br> - Identification of the level of coverage (i.e. low or high), including the actuarial value of the plan determined in accordance with the proposed rule; <br> - Certification of the level of coverage by a member of the American Academy of Actuaries using generally accepted actuarial principles; and <br> - Demonstration that the plan has a reasonable annual limitation on cost-sharing. | N/A | N/A |

CERTIFYING SIGNATURE
The undersigned representative of the organization submitting this rate filing attests that all items contained in the above checklist have been included in the filing to the best of the company's ability.

DC Gold OAEPO 1650 100\% HSA T

## Actuarial Value Snapshot

The Actuarial Value Calculator (AV Calculator) is designed to give an estimate of network liability for a given plan design. This build of the AV Calculator uses data from a large national commercial database to build continuance tables by metal tier.


```
Option 3 Additive TIF adj -1.00%
Final AV - 81.81%
```

This product, DC Gold OAEPO 1650 100\% HSA T, satisfies the HHS guidelines for a Gold plan with an Actuarial Value of $81.81 \%$

DC Silver OAEPO 3000 100\% HSA E

## Actuarial Value Snapshot

The Actuarial Value Calculator (AV Calculator) is designed to give an estimate of network liability for a given plan design. This build of the AV Calculator uses data from a large national commercial database to build continuance tables by metal tier.


This product, DC Silver OAEPO 3000 100\% HSA E, satisfies the HHS guidelines for a Silver plan with an Actuarial Value of $71.73 \%$

DC Silver OAEPO 2800 90\% HSA E

## Actuarial Value Snapshot

The Actuarial Value Calculator (AV Calculator) is designed to give an estimate of network liability for a given plan design. This build of the AV Calculator uses data from a large national commercial database to build continuance tables by metal tier.


This product, DC Silver OAEPO 2800 90\% HSA E, satisfies the HHS guidelines for a Silver plan with an Actuarial Value of $71.94 \%$

DC Gold OAEPO 70\% \$25/40 E

## Actuarial Value Snapshot

The Actuarial Value Calculator (AV Calculator) is designed to give an estimate of network liability for a given plan design. This build of the AV Calculator uses data from a large national commercial database to build continuance tables by metal tier.


This product, DC Gold OAEPO $70 \%$ \$25/40 E, satisfies the HHS guidelines for a Gold plan with an Actuarial Value of 81.94\%

DC Gold OAEPO 500 90\% \$25/40 E

## Actuarial Value Snapshot

The Actuarial Value Calculator (AV Calculator) is designed to give an estimate of network liability for a given plan design. This build of the AV Calculator uses data from a large national commercial database to build continuance tables by metal tier.


This product, DC Gold OAEPO $50090 \% \$ 25 / 40 \mathrm{E}$, satisfies the HHS guidelines for a Gold plan with an Actuarial Value of $79.35 \%$

DC Silver OAEPO 4800 80\% \$25/45 E

## Actuarial Value Snapshot

The Actuarial Value Calculator (AV Calculator) is designed to give an estimate of network liability for a given plan design. This build of the AV Calculator uses data from a large national commercial database to build continuance tables by metal tier.


This product, DC Silver OAEPO 4800 80\% \$25/45 E, satisfies the HHS guidelines for a Silver plan with an Actuarial Value of $71.75 \%$

DC Gold OAEPO 1500 90\% E

## Actuarial Value Snapshot

The Actuarial Value Calculator (AV Calculator) is designed to give an estimate of network liability for a given plan design. This build of the AV Calculator uses data from a large national commercial database to build continuance tables by metal tier.


This product, DC Gold OAEPO 1500 90\% E, satisfies the HHS guidelines for a Gold plan with an Actuarial Value of 79.77\%

DC Bronze OAEPO 6000 80\% \$15/50 E

## Actuarial Value Snapshot

The Actuarial Value Calculator (AV Calculator) is designed to give an estimate of network liability for a given plan design. This build of the AV Calculator uses data from a large national commercial database to build continuance tables by metal tier.


This product, DC Bronze OAEPO $600080 \%$ \$15/50 E, satisfies the HHS guidelines for a Bronze Expansion plan with an Actuarial Value of $63.60 \%$

## Aetna Life Insurance Company

HIOS ISSUER ID: 77422

Exhibit A
Product Portfolio \& Projected Membership Distribution

| HIOS Plan-ID | Network | Plan | Metallic Tier | Actuarial Value | Exchange Offering | Projected Membership Distribution |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 77422DC0110001 | PPO | DC Bronze OAEPO 6000 80\% \$15/50 E | Bronze | 63.60\% | Yes | 4.9\% |
| 77422DC0110002 | PPO | DC Gold OAEPO 1500 90\% E | Gold | 79.77\% | Yes | 22.1\% |
| 77422DC0110003 | PPO | DC Gold OAEPO 1650 100\% HSA T | Gold | 81.81\% | Yes | 21.9\% |
| 77422DC0110004 | PPO | DC Gold OAEPO 500 90\% \$25/40 E | Gold | 79.35\% | Yes | 21.9\% |
| 77422DC0110005 | PPO | DC Gold OAEPO 70\% \$25/40 E | Gold | 81.94\% | Yes | 21.9\% |
| 77422DC0110008 | PPO | DC Silver OAEPO 2800 90\% HSA E | Silver | 71.94\% | Yes | 2.5\% |
| 77422DC0110006 | PPO | DC Silver OAEPO 3000 100\% HSA E | Silver | 71.73\% | Yes | 2.4\% |
| 77422DC0110007 | PPO | DC Silver OAEPO 4800 80\% \$25/45 E | Silver | 71.75\% | Yes | 2.4\% |

## Aetna Life Insurance Company

 HIOS ISSUER ID: 77422Exhibit 1
2021 Rate Increases by Product

| Product | Average Rate Increase | Minimum Rate Increase | Maximum Rate Increase |
| :---: | :---: | :---: | :---: |
| ElectChoiceOpenAccess | $38.04 \%$ | $36.39 \%$ | $43.58 \%$ |

Exhibit 2
Claim Impact due to Demographic Changes

|  | Experience Period Distribution |  | Experience Demographic Factor |  | Projected Period Distribution |  | Projection Demographic Factor |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Age | Male | Female | Male | Female | Male | Female | Male | Female |
| 0 | 0.41\% | 2.13\% | 1.050 | 0.939 | 0.55\% | 0.48\% | 1.050 | 0.939 |
| 1 | 1.08\% | 0.84\% | 1.050 | 0.939 | 0.56\% | 0.46\% | 1.050 | 0.939 |
| 2 | 0.20\% | 1.11\% | 0.601 | 0.596 | 0.67\% | 0.48\% | 0.601 | 0.596 |
| 3 | 0.20\% | 0.41\% | 0.601 | 0.596 | 0.59\% | 0.50\% | 0.601 | 0.596 |
| 4 | 1.25\% | 0.24\% | 0.601 | 0.596 | 0.57\% | 0.48\% | 0.601 | 0.596 |
| 5 | 0.34\% | 0.30\% | 0.570 | 0.565 | 0.62\% | 0.51\% | 0.570 | 0.565 |
| 6 | 0.91\% | 0.27\% | 0.570 | 0.565 | 0.60\% | 0.56\% | 0.570 | 0.565 |
| 7 | 0.51\% | 0.37\% | 0.570 | 0.565 | 0.65\% | 0.51\% | 0.570 | 0.565 |
| 8 | 0.07\% | 0.81\% | 0.570 | 0.565 | 0.64\% | 0.61\% | 0.570 | 0.565 |
| 9 | 0.00\% | 0.37\% | 0.570 | 0.565 | 0.53\% | 0.60\% | 0.570 | 0.565 |
| 10 | 0.44\% | 0.71\% | 0.578 | 0.565 | 0.61\% | 0.70\% | 0.578 | 0.565 |
| 11 | 0.14\% | 0.00\% | 0.578 | 0.565 | 0.60\% | 0.63\% | 0.578 | 0.565 |
| 12 | 0.10\% | 0.24\% | 0.578 | 0.565 | 0.64\% | 0.60\% | 0.578 | 0.565 |
| 13 | 0.03\% | 0.07\% | 0.578 | 0.565 | 0.73\% | 0.59\% | 0.578 | 0.565 |
| 14 | 0.14\% | 0.51\% | 0.578 | 0.565 | 0.72\% | 0.59\% | 0.578 | 0.565 |
| 1 | 0.61\% | 0.41\% | 0.606 | 0.615 | 0.66\% | 0.59\% | 0.606 | 0.615 |
| 16 | 0.07\% | 0.00\% | 0.606 | 0.615 | 0.77\% | 0.64\% | 0.606 | 0.615 |
| 17 | 0.24\% | 0.07\% | 0.606 | 0.615 | 0.81\% | 0.66\% | 0.606 | 0.615 |
| 18 | 0.37\% | 0.00\% | 0.606 | 0.615 | 0.72\% | 0.64\% | 0.606 | 0.615 |
| 19 | 0.20\% | 0.07\% | 0.606 | 0.615 | 0.58\% | 0.68\% | 0.606 | 0.615 |
| 20 | 0.07\% | 0.74\% | 0.451 | 0.741 | 0.56\% | 0.79\% | 0.451 | 0.741 |
| 21 | 0.30\% | 0.98\% | 0.451 | 0.741 | 0.75\% | 0.73\% | 0.451 | 0.741 |
| 22 | 0.17\% | 0.54\% | 0.451 | 0.741 | 0.65\% | 0.67\% | 0.451 | 0.741 |
| 23 | 1.39\% | 1.01\% | 0.451 | 0.741 | 0.73\% | 0.75\% | 0.451 | 0.741 |
| 24 | 1.01\% | 1.08\% | 0.451 | 0.741 | 0.69\% | 0.70\% | 0.451 | 0.741 |
| 25 | 0.88\% | 1.93\% | 0.460 | 1.106 | 0.73\% | 0.79\% | 0.460 | 1.106 |
| 26 | 1.05\% | 2.26\% | 0.460 | 1.106 | 0.72\% | 0.98\% | 0.460 | 1.106 |
| 27 | 2.20\% | 1.82\% | 0.460 | 1.106 | 0.86\% | 0.90\% | 0.460 | 1.106 |
| 28 | 2.40\% | 2.64\% | 0.460 | 1.106 | 0.92\% | 0.89\% | 0.460 | 1.106 |
| 29 | 2.77\% | 2.09\% | 0.460 | 1.106 | 0.77\% | 0.92\% | 0.460 | 1.106 |
| 30 | 1.96\% | 1.35\% | 0.519 | 1.197 | 0.72\% | 0.92\% | 0.519 | 1.197 |
| 31 | 1.22\% | 2.87\% | 0.519 | 1.197 | 0.87\% | 0.93\% | 0.519 | 1.197 |
| 32 | 0.41\% | 2.91\% | 0.519 | 1.197 | 0.87\% | 0.98\% | 0.519 | 1.197 |
| 33 | 2.09\% | 2.26\% | 0.519 | 1.197 | 0.83\% | 0.99\% | 0.519 | 1.197 |
| 34 | 1.59\% | 2.13\% | 0.519 | 1.197 | 0.95\% | 0.92\% | 0.519 | 1.197 |
| 35 | 0.61\% | 1.66\% | 0.630 | 1.197 | 0.85\% | 1.00\% | 0.630 | 1.197 |
| 36 | 1.22\% | 1.59\% | 0.630 | 1.197 | 0.92\% | 0.98\% | 0.630 | 1.197 |
| 37 | 1.28\% | 1.72\% | 0.630 | 1.197 | 1.03\% | 1.04\% | 0.630 | 1.197 |
| 38 | 1.08\% | 0.78\% | 0.630 | 1.197 | 1.04\% | 0.92\% | 0.630 | 1.197 |
| 39 | 0.88\% | 0.37\% | 0.630 | 1.197 | 0.85\% | 0.83\% | 0.630 | 1.197 |
| 40 | 1.08\% | 0.03\% | 0.790 | 1.197 | 0.80\% | 0.84\% | 0.790 | 1.197 |
| 41 | 1.01\% | 1.01\% | 0.790 | 1.197 | 0.89\% | 0.93\% | 0.790 | 1.197 |
| 42 | 1.42\% | 1.22\% | 0.790 | 1.197 | 0.79\% | 0.87\% | 0.790 | 1.197 |
| 43 | 1.05\% | 1.11\% | 0.790 | 1.197 | 0.75\% | 0.73\% | 0.790 | 1.197 |
| 44 | 0.51\% | 0.78\% | 0.790 | 1.197 | 0.79\% | 0.77\% | 0.790 | 1.197 |
| 45 | 0.14\% | 0.64\% | 1.000 | 1.269 | 0.84\% | 0.80\% | 1.000 | 1.269 |
| 46 | 0.14\% | 0.44\% | 1.000 | 1.269 | 0.99\% | 0.85\% | 1.000 | 1.269 |
| 47 | 0.61\% | 0.30\% | 1.000 | 1.269 | 0.82\% | 0.84\% | 1.000 | 1.269 |
| 48 | 0.41\% | 1.18\% | 1.000 | 1.269 | 0.88\% | 0.88\% | 1.000 | 1.269 |
| 49 | 0.07\% | 0.14\% | 1.000 | 1.269 | 0.89\% | 0.97\% | 1.000 | 1.269 |
| 50 | 0.30\% | 0.24\% | 1.370 | 1.460 | 0.99\% | 0.80\% | 1.370 | 1.460 |
| 51 | 0.14\% | 0.41\% | 1.370 | 1.460 | 1.09\% | 0.88\% | 1.370 | 1.460 |
| 52 | 0.24\% | 0.47\% | 1.370 | 1.460 | 0.96\% | 0.94\% | 1.370 | 1.460 |
| 53 | 0.57\% | 0.17\% | 1.370 | 1.460 | 0.98\% | 0.95\% | 1.370 | 1.460 |
| 54 | 0.41\% | 0.30\% | 1.370 | 1.460 | 1.11\% | 0.86\% | 1.370 | 1.460 |
| 55 | 0.30\% | 0.47\% | 1.757 | 1.745 | 1.06\% | 0.83\% | 1.757 | 1.745 |
| 56 | 0.78\% | 0.61\% | 1.757 | 1.745 | 0.90\% | 0.76\% | 1.757 | 1.745 |
| 57 | 0.44\% | 0.24\% | 1.757 | 1.745 | 0.83\% | 0.75\% | 1.757 | 1.745 |
| 58 | 0.24\% | 0.54\% | 1.757 | 1.745 | 0.88\% | 0.75\% | 1.757 | 1.745 |
| 59 | 0.68\% | 0.14\% | 1.757 | 1.745 | 0.76\% | 0.70\% | 1.757 | 1.745 |
| 60 | 0.88\% | 0.20\% | 2.218 | 2.128 | 0.80\% | 0.65\% | 2.218 | 2.128 |
| 61 | 0.37\% | 0.68\% | 2.218 | 2.128 | 0.73\% | 0.63\% | 2.218 | 2.128 |
| 62 | 0.74\% | 1.15\% | 2.218 | 2.128 | 0.64\% | 0.62\% | 2.218 | 2.128 |
| 63 | 0.30\% | 0.17\% | 2.218 | 2.128 | 0.54\% | 0.49\% | 2.218 | 2.128 |
| 64 | 0.41\% | 0.00\% | 2.218 | 2.128 | 0.42\% | 0.36\% | 2.218 | 2.128 |
| 65+ | 0.17\% | 0.47\% | 3.200 | 2.700 | 0.54\% | 0.62\% | 3.200 | 2.700 |

Experience Period Demographi
Note:
Experience Period Demographic Factor computed as the weighted average of gender specific Demographic
Factor by current population distribution.

## Projected Demographic Factor <br> 1.0479

Note:
Projected Demographic Factor computed as the weighted average of gender specific Demographic Factor by projected population distribution.

| Demographic Change | 1.0629 |
| :--- | ---: |
| Note: <br> Claim Impact due to Demographic Changes computed <br> as the ratio of the Projected Demographic |  |
| Factor over the Experience Period Demographic Factor. |  | ?

## Aetna Life Insurance Company

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## Exhibit 3

Projected Membership Distribution by County

| Rating Area | Counties | Experience Period <br> Membership | Experience Period <br> Area Factor | Projected <br> Membership | Projected Area <br> Factor |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| District of Columbia |  |  |  |  |  |  | $100 \%$ | 1.000 | $100 \%$ | 1.000 |


| Average Experience Period <br> Area Factor | 1.0000 |
| :---: | :---: |

Note:
Average Experience Period Area Factor computed
as the weighted average of Experience Period Area Factors by experience period membership distribution.

| Average Projected Area <br> Factor | 1.0000 |
| :--- | :--- |

Note:
Projected Area Factor
computed as the weighted average of Projection Period
Area Factors by projected membership distribution.

| Area Shift Factor | 1.0000 |
| :---: | :---: |

Note:
Area Shift Factor computed as the ratio of the Projected
Membership by Area over the Experience Membership by Area Factor represents:
The impact due to the shift of the population
distribution across areas.

| Area Factor Change | 1.0000 |
| :--- | :--- |

Note:
Area Factor Change computed as the ratio of the Projected Area Factor over the Experience Area Factor both using experience membership
Factor represents:
The impact due to cost relativity changes, including
changes to provider networks and contracts,
from the experience period to the rating period.

## Aetna Life Insurance Company

## Exhibit 4

Projected Membership and Paid to Allowed by Metal Tier

| Metallic Tier | Projected <br> Membership | Projected Paid to Allowed <br> Ratio |
| :--- | ---: | ---: |
| Platinum | 0 | $\mathrm{~N} / \mathrm{A}$ |
| Gold | 561 | $87 \%$ |
| Silver | 46 | $79 \%$ |
| Bronze | 31 | $71 \%$ |
| Catastrophic | 0 | $\mathrm{~N} / \mathrm{A}$ |
| Total | 638 | $86 \%$ |

## Aetna Life Insurance Company

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Exhibit 5
Retention as a Percent of Premium and PMPM

| Retention Components | \% of Premium | PMPM |
| :--- | ---: | ---: |
| Administrative Expense Load | $7.40 \%$ | $\$ 57.11$ |
| Profit \& Risk Load | $4.74 \%$ | $\$ 36.58$ |
| Premium Tax | $3.43 \%$ | $\$ 26.47$ |
| User Exchange Fee | $0.90 \%$ | $\$ 6.95$ |
| State Based Exchange Fee | $0.00 \%$ | $\$ 0.00$ |
| HIF | $0.00 \%$ | $\$ 0.00$ |
| Risk Adjustment User Fee | $0.02 \%$ | $\$ 0.19$ |
| Total Taxes and Fees | Federal Income Tax | $1.26 \%$ |

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## Exhibit 6 <br> MLR Projection

|  |  |  | Formula |
| :---: | :--- | ---: | :--- |
| (a) | Premium (pmpm) | $\$ 771.76$ |  |
| (b) | Medical Cost (pmpm) | $\$ 634.74$ |  |
| (c) | Medical Benefit Ratio (MBR) | $82.2 \%$ | $=$ (c) / (b) |
|  |  |  |  |
| (d) | Quality Improvement Action (pmpm) | $\$ 6.17$ | $=$ (a) $\times 0.80 \%$ |
| (e) | Taxes and Fees (pmpm) | $\$ 43.33$ |  |
|  |  |  |  |
| (f) | Adjusted Premium (pmpm) | $\$ 728.43$ | $=(\mathrm{a})-(\mathrm{e})$ |
| (g) | Adjusted Claims (pmpm) | $\$ 640.91$ | $=(\mathrm{b})+(\mathrm{d})$ |
|  | Medical Loss Ratio (MLR) | $\mathbf{8 8 . 0 \%}$ | $=(\mathrm{g}) /(\mathrm{f})$ |

Notes:
ACA adjustments for QIA and taxes and fees are estimates based on historical experience and projected expenses.

Values reflect current actuarial projections and will differ from the final reported MLR.

This projection applies to the products included in this filing and is a standalone calculation for the 2021 calendar year. This projection differs from the MLR calculation specified by PPACA which includes three years of experience for all business in the MLR pool.

## Aetna Life Insurance Company

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Exhibit 7
Quarterly Trend Factors

| Effective Quarter | Membership | Trend Factor | Index Rate |
| :--- | :---: | :---: | ---: |
| 1Q 2021 | $68.3 \%$ | 1.000 | $\$ 771.73$ |
| 2Q 2021 | $8.6 \%$ | 1.027 | $\$ 792.76$ |
| 3Q 2021 | $8.9 \%$ | 1.055 | $\$ 814.36$ |
| 4Q 2021 | $14.2 \%$ | 1.084 | $\$ 836.55$ |
| Total | $100.0 \%$ | 1.019 | $\$ 786.52$ |

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## Exhibit 8

Trend Exhibit

| Service Type | Unit Cost | Utilization | Total <br> Allowed |  |  |  |  |  |
| ---: | ---: | ---: | ---: | :---: | :---: | :---: | :---: | :---: |
| Facility Inpatient | $5.6 \%$ | $2.5 \%$ | $8.2 \%$ |  |  |  |  |  |
| Facility Outpatient | $3.6 \%$ | $7.0 \%$ | $10.8 \%$ |  |  |  |  |  |
| Physician | $1.5 \%$ | $7.0 \%$ | $8.6 \%$ |  |  |  |  |  |
| Capitation | $0.0 \%$ | $0.0 \%$ | $0.0 \%$ |  |  |  |  |  |
| Medical | $3.1 \%$ | $6.3 \%$ | $9.6 \%$ |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Total (Med + Rx) | $9.7 \%$ | $2.6 \%$ | $12.6 \%$ |  |  |  |  |  |
|  |  |  |  |  |  | $4.5 \%$ | $5.6 \%$ | $10.2 \%$ |

## Aetna Life Insurance Company

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## Exhibit 9

## Sample Rate Calculation

The following steps outline the mathematical formula used to develop the member level rates for a sample small group. The input assumptions and the census provided below are for illustrative purposes only.

## Sample Small Group Information:

Effective Date:
Rating Area:
1/1/2021

Plan:
Rating Area 1
DC Gold OAEPO 1650 100\% HSA T

## Group Census

Employee 1
Employee 2
Employee 3
Employee 4
Employee 5
Employee 6
Employee 7
Employee 8
Employee 9
Employee 10

| Employee <br> Age |
| :---: |
| Spouse <br> Age |
| Child 1 <br> Age |
| 35 |

Age and Tobacco

## Factors

Employee 1
Employee 2
Employee 3
Employee 4
Employee 5
Employee 6
Employee 7
Employee 8
Employee 9
Employee 10

| Age Factors |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| Employee | Spouse | Child 1 | Child 2 | Child 3 |
| 0.876 | 0.896 | 0.654 | 0.654 |  |
| 1.801 | 1.545 |  |  |  |
| 0.727 | 0.727 |  |  |  |
| 1.545 | 1.377 | 0.654 | 0.654 | 0.654 |
| 2.181 | 2.181 | 0.727 |  |  |
| 1.944 | 2.099 | 0.727 |  |  |
| 1.801 | 1.487 |  |  |  |
| 1.053 | 1.013 |  |  |  |
| 0.836 | 0.856 | 0.654 | 0.654 | 0.654 |
| 0.727 | 0.744 | 0.654 | 0.654 |  |

Step 1: Multiply Market Base Rate x Rating Area Factor x Plan Factor x Effective Date Factor

Market Base Rate $=$
\$652.76
x Rating Area Factor (Rating Area 1) 1.0000
x Plan Factor 1.1040
x Effective Date Factor
Market Base Rate adjusted for Plan/Area/Effective Date =
1.0000
\$720.65

Step 2: Multiply Adjusted Market Base Rate in Step 1 by the Member level Age and Tobacco Factors:

## Member Monthly Rates

Employee 1
Employee 2
Employee 3
Employee 4
Employee 5
Employee 6
Employee 7
Employee 8
Employee 9
Employee 10

| Employee | Spouse | Child 1 | Child 2 | Child 3 |
| ---: | ---: | ---: | ---: | ---: |
| $\$ 631.29$ | $\$ 645.70$ | $\$ 471.30$ | $\$ 471.30$ |  |
| $\$ 1,297.89$ | $\$ 1,113.40$ |  |  |  |
| $\$ 523.91$ | $\$ 523.91$ |  |  |  |
| $\$ 1,113.40$ | $\$ 992.33$ | $\$ 471.30$ | $\$ 471.30$ | $\$ 471.30$ |
| $\$ 1,571.73$ | $\$ 1,571.73$ | $\$ 523.91$ |  |  |
| $\$ 1,400.94$ | $\$ 1,512.64$ | $\$ 523.91$ |  |  |
| $\$ 1,297.89$ | $\$ 1,071.60$ |  |  |  |
| $\$ 758.84$ | $\$ 730.02$ |  |  |  |
| $\$ 602.46$ | $\$ 616.87$ | $\$ 471.30$ | $\$ 471.30$ | $\$ 471.30$ |
| $\$ 523.91$ | $\$ 536.16$ | $\$ 471.30$ | $\$ 471.30$ |  |

## Total

\$2,219.59
\$2,411.29
\$1,047.82
\$3,519.63
\$3,667.37
\$3,437.49
\$2,369.49
\$1,488.86
\$2,633.23
\$2,002.67

Group Total Monthly Premium:

Note: Member level monthly rates are rounded to the nearest penny.

# Aetna Life Insurance Company 

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Exhibit 10
Plan Mapping

| 2019 HIOS Plan ID | 2019 Plan Name | 2020 HIOS Plan ID | 2020 Plan Name | 2021 HIOS Plan ID | 2021 Plan Name |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 77422DC0110001 | DC Bronze OAEPO 6000 80\% HSA E | 77422DC0110001 | DC Bronze OAEPO 6000 80\% \$15/50 E | 77422DC0110001 | DC Bronze OAEPO 6000 80\% \$15/50 E |
| 77422DC0110006 | DC Silver OAEPO 3000 100\% HSA E | 77422DC0110006 | DC Silver OAEPO 3000 100\% HSA E | 77422DC0110006 | DC Silver OAEPO 3000 100\% HSA E |
| 77422DC0110003 | DC Gold OAEPO 1600 100\% HSA T | 77422DC0110003 | DC Gold OAEPO 1650 100\% HSA T | 77422DC0110003 | DC Gold OAEPO 1650 100\% HSA T |
| 77422DC0110004 | DC Gold OAEPO 500 90\% E | 77422DC0110004 | DC Gold OAEPO 500 90\% \$25/40 E | 77422DC0110004 | DC Gold OAEPO 500 90\% \$25/40 E |
| 77422DC0110005 | DC Gold OAEPO 70\% T | 77422DC0110005 | DC Gold OAEPO 70\% \$25/40 T | 77422DC0110005 | DC Gold OAEPO 70\% \$25/40 E |
| 77422DC0110007 | DC Silver OAEPO 4800 80\% E | 77422DC0110007 | DC Silver OAEPO 4800 80\% \$25/40 E | 77422DC0110007 | DC Silver OAEPO 4800 80\% \$25/45 E |
| 77422DC0110002 | DC Gold OAEPO 1000 100\% E | 77422DC0110002 | DC Gold OAEPO 1500 90\% E | 77422DC0110002 | DC Gold OAEPO 1500 90\% E |
|  |  | 77422DC0110008 | DC Silver OAEPO 2800 90\% HSA E | 77422DC0110008 | DC Silver OAEPO 2800 90\% HSA E |

## Aetna Life Insurance Company

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Exhibit 11
Projected Age/Gender Distribution

| Age | Male | Female | DC Age Factor |
| :---: | :---: | :---: | :---: |
| 0-14 | 9.24\% | 8.28\% | 0.654 |
| 15 | 0.66\% | 0.58\% | 0.654 |
| 16 | 0.76\% | 0.63\% | 0.654 |
| 17 | 0.81\% | 0.65\% | 0.654 |
| 18 | 0.72\% | 0.64\% | 0.654 |
| 19 | 0.57\% | 0.68\% | 0.654 |
| 20 | 0.55\% | 0.78\% | 0.654 |
| 21 | 0.75\% | 0.73\% | 0.727 |
| 22 | 0.65\% | 0.67\% | 0.727 |
| 23 | 0.73\% | 0.75\% | 0.727 |
| 24 | 0.69\% | 0.70\% | 0.727 |
| 25 | 0.73\% | 0.79\% | 0.727 |
| 26 | 0.72\% | 0.98\% | 0.727 |
| 27 | 0.86\% | 0.90\% | 0.727 |
| 28 | 0.92\% | 0.89\% | 0.744 |
| 29 | 0.77\% | 0.92\% | 0.760 |
| 30 | 0.72\% | 0.92\% | 0.779 |
| 31 | 0.87\% | 0.93\% | 0.799 |
| 32 | 0.87\% | 0.98\% | 0.817 |
| 33 | 0.83\% | 0.99\% | 0.836 |
| 34 | 0.95\% | 0.92\% | 0.856 |
| 35 | 0.85\% | 1.00\% | 0.876 |
| 36 | 0.92\% | 0.98\% | 0.896 |
| 37 | 1.03\% | 1.04\% | 0.916 |
| 38 | 1.04\% | 0.92\% | 0.927 |
| 39 | 0.85\% | 0.83\% | 0.938 |
| 40 | 0.80\% | 0.84\% | 0.975 |
| 41 | 0.89\% | 0.93\% | 1.013 |
| 42 | 0.79\% | 0.87\% | 1.053 |
| 43 | 0.75\% | 0.73\% | 1.094 |
| 44 | 0.79\% | 0.77\% | 1.137 |
| 45 | 0.84\% | 0.80\% | 1.181 |
| 46 | 0.99\% | 0.85\% | 1.227 |
| 47 | 0.82\% | 0.84\% | 1.275 |
| 48 | 0.88\% | 0.88\% | 1.325 |
| 49 | 0.89\% | 0.97\% | 1.377 |
| 50 | 0.99\% | 0.80\% | 1.431 |
| 51 | 1.09\% | 0.88\% | 1.487 |
| 52 | 0.96\% | 0.94\% | 1.545 |
| 53 | 0.98\% | 0.95\% | 1.605 |
| 54 | 1.11\% | 0.86\% | 1.668 |
| 55 | 1.06\% | 0.83\% | 1.733 |
| 56 | 0.90\% | 0.76\% | 1.801 |
| 57 | 0.83\% | 0.75\% | 1.871 |
| 58 | 0.88\% | 0.75\% | 1.944 |
| 59 | 0.76\% | 0.70\% | 2.020 |
| 60 | 0.80\% | 0.65\% | 2.099 |
| 61 | 0.73\% | 0.63\% | 2.181 |
| 62 | 0.64\% | 0.62\% | 2.181 |
| 63 | 0.54\% | 0.49\% | 2.181 |
| 64 | 0.42\% | 0.36\% | 2.181 |
| 65+ | 0.54\% | 0.62\% | 2.181 |

Age Calibration Factor 1.082

## Note:

Age Calibration Factor
computed as the weighted average of HHS Age Factor by projected membership distribution.


Note:
This is the age that most closely corresponds to the age calibration factor.

## Aetna Life Insurance Company <br> \section*{HIOS ISSUER ID: 77422}

Exhibit A-1
Rate Change by Plan

| $\mathbf{2 0 2 0}$ HIOS Plan ID | 2020 Plan Name | 1Q2020 <br> Premium Rate | 2021 HIOS Plan ID | 2021 Plan Name |
| :--- | :--- | :---: | :---: | :---: | :---: | :---: |

## Aetna Life Insurance Company

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Exhibit 12
Comparison of Key Pricing Factors to LY (2021) Pricing

| Category | 2020 | 2021 | \% Impact to Premium | Description |
| :---: | :---: | :---: | :---: | :---: |
| Base Experience PMPM* | \$327.30 | \$450.35 | 21.3\% | Using all SG experience (HMO/PPO) from DC (24\%) and IH (76\%) |
| Pricing Trend (annual) | 9.6\% | 11.2\% | 13.0\% | Experience higher utilization and unit cost pressure |
| Morbidity | 1.02 | 1.10 | 7.8\% | Expecting market risk pool to deteriorate slightly |
| Benefit | 0.992 | 1.004 | 1.0\% | Richer portfolio in 2021 compared to 2020 |
| Demographic | 1.054 | 1.025 | -0.8\% | Expecting shift upward in age/gender mix |
| Area Factor | 1.000 | 1.000 | 0.0\% | No material change |
| Other | 1.030 | 1.007 | -1.2\% | Ben Chg, Ded Supp, etc. |
| Network Change | 1.034 | 1.044 | 2.5\% | Adj to normalize experience for manual pricing |
| Risk Adjustment | \$5.56 | \$26.02 | -3.5\% | 2021 Projection based on Wakely 2019 Accruals |
| Projected Claim Cost | \$443.32 | \$634.74 | 40.0\% |  |
| \% of Premium Items |  |  |  |  |
| Admin | 8.7\% | 6.6\% | 0.2\% |  |
| Profit | 5.5\% | 6.0\% | 2.7\% |  |
| FIT | 1.15\% | 1.26\% | 0.6\% |  |
| AFIT | 4.31\% | 4.74\% | 2.1\% |  |
| Taxes \& Fees | 8.1\% | 5.2\% | -1.1\% |  |
| Commissions | 1.2\% | 0.8\% | 0.0\% |  |
| Prem Tax | 3.4\% | 3.4\% | 1.2\% |  |
| HIF | 2.6\% | 0.0\% | -2.6\% | 2021 HIF removed |
| Federal EUF | 0.9\% | 0.9\% | 0.3\% |  |
| State EUF | 0.0\% | 0.0\% | 0.0\% | N/A |
| Risk Adjustment User Fee | 0.03\% | 0.02\% | 0.0\% | No material change |
| Total \% of Prem | 22.25\% | 17.75\% |  |  |
| Single Risk Pool Premium | \$576.79 | \$780.17 | 35.3\% | Plan Adjusted Markedt Index Rate - Wksht II Field \# 3.10 |
| SG Trend Factor | 1.019 | 1.019 | 0.1\% |  |
| Index Rate | \$587.48 | \$795.12 |  |  |
| Calibration Factors |  |  |  |  |
| Trend | 1.019 | 1.019 |  |  |
| Age | 1.077 | 1.082 |  |  |
| Area | 0.999 | 1.000 |  |  |
| Tobacco | 1.000 | 1.000 |  |  |
| Avg 1.0 Premium | \$535.92 | \$721.10 |  | Calibrated Plan Ajusted Index Rate - Wksht II Field \# 3.14 |
| Remove trend factor | \$526.17 | \$707.54 |  |  |
| Consumer Premium Relativity | 0.812 | 0.856 |  |  |
| Avg Prem | \$427.05 | \$605.80 | 41.86\% |  |
| Premium Mix | 0.971 | 0.945 | -2.7\% |  |
| Avg Projection Period Premium | \$414.76 | \$572.53 | 38.0\% | Ties back to Wksht II Field \# 1.13 |

## Footnote

*Base Experience PMPM for 2020 is 2018 Claims experience used for pricing LY with 1 year of trend to bring the claim level to 2019
*Base Experience PMPM for 2021 is 2019 Claims experience

