State: District of Columbia Filing Company: UnitedHealthcare Insurance Company

TOI/Sub-TOI: H16G Group Health - Major Medical/H16G.003G Small Group Only - Other

Product Name: DC-SG-UHIC-2024-01

Project Name/Number: /

# Filing at a Glance

Company: UnitedHealthcare Insurance Company

Product Name: DC-SG-UHIC-2024-01
State: District of Columbia

TOI: H16G Group Health - Major Medical Sub-TOI: H16G.003G Small Group Only - Other

Filing Type: Rate

Date Submitted: 05/01/2023

SERFF Tr Num: UHLC-133628683

SERFF Status: Assigned

State Tr Num: State Status: Co Tr Num:

Effective 01/01/2024

Date Requested:

Author(s): Kelly Smith, Maria Ilea, Michelle Lorenzo, Ryan Morgan, Daniel Schneck

Reviewer(s): Dave Dillon (primary), Efren Tanhehco, Stephen Flick

Disposition Date:
Disposition Status:
Effective Date:

State Filing Description:

State: District of Columbia Filing Company: UnitedHealthcare Insurance Company

TOI/Sub-TOI: H16G Group Health - Major Medical/H16G.003G Small Group Only - Other

Product Name: DC-SG-UHIC-2024-01

Project Name/Number: /

**General Information** 

Project Name: Status of Filing in Domicile:
Project Number: Date Approved in Domicile:
Requested Filing Mode: Review & Approval Domicile Status Comments:

Explanation for Combination/Other: Market Type: Group

Submission Type: New Submission

Group Market Size: Small

Group Market Type: Employer

Overall Rate Impact:

Filing Status Changed: 05/02/2023

State Status Changed: Deemer Date:

Created By: Ryan Morgan Submitted By: Ryan Morgan

Corresponding Filing Tracking Number:

PPACA: Non-Grandfathered Immed Mkt Reforms

PPACA Notes: null

Include Exchange Intentions: No

Filing Description:

2024 DC SG UHIC Rate Filing

# **Company and Contact**

**Filing Contact Information** 

Ryan Morgan, ryan\_morgan2@uhc.com 10701 W Research Dr 414-443-4287 [Phone]

Wauwatosa, WI 53226

**Filing Company Information** 

UnitedHealthcare Insurance CoCode: 79413 State of Domicile: Connecticut

Company Group Code: 707 Company Type: Life and

185 Asylum Street Group Name: Health

Hartford, CT 06103 FEIN Number: 36-2739571 State ID Number: 79413

(860) 702-5000 ext. [Phone]

State: District of Columbia Filing Company: UnitedHealthcare Insurance Company

TOI/Sub-TOI: H16G Group Health - Major Medical/H16G.003G Small Group Only - Other

Product Name: DC-SG-UHIC-2024-01

Project Name/Number: /

# **Filing Fees**

# **State Fees**

Fee Required? No Retaliatory? No

Fee Explanation:

State: District of Columbia Filing Company: UnitedHealthcare Insurance Company

TOI/Sub-TOI: H16G Group Health - Major Medical/H16G.003G Small Group Only - Other

Product Name: DC-SG-UHIC-2024-01

Project Name/Number: /

# **Rate Information**

Rate data applies to filing.

Filing Method: Review & Approval

Rate Change Type: Increase

Overall Percentage of Last Rate Revision: 8.000%

Effective Date of Last Rate Revision: 01/01/2023

Filing Method of Last Filing: Review & Approval SERFF Tracking Number of Last Filing: UHLC-133227637

# **Company Rate Information**

Company Name:	Company Rate Change:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Premium for	Maximum % Change (where req'd):	Minimum % Change (where req'd):
UnitedHealthcare Insurance Company	Increase	6.000%	6.000%	\$5,119,263	1,995	\$85,321,042	3.800%	10.100%

State: District of Columbia Filing Company: UnitedHealthcare Insurance Company

TOI/Sub-TOI: H16G Group Health - Major Medical/H16G.003G Small Group Only - Other

Product Name: DC-SG-UHIC-2024-01

Project Name/Number: /

## Rate Review Detail

**COMPANY:** 

Company Name: UnitedHealthcare Insurance Company

HHS Issuer Id: 25978

#### **PRODUCTS:**

Product Name	HIOS Product ID	HIOS Submission ID	Number of Covered
			Lives
EPO/POS			10812

Trend Factors:

FORMS:

New Policy Forms: COC23.SHOP.I.2018.SG.DC SBN23.CHP.I.2018.SG.DC.CURX

SBN23.CHP.I.2018.SG.DC.CUR5 SBN23.CHP.I.2018.SG.DC.CUR7 SBN23.CHP.I.2018.SG.DC.CUSI SBN23.CHP.I.2018.SG.DC.CUSM SBN23.CHP.I.2018.SG.DC.CUS6 SBN23.CHP.I.2018.SG.DC.CURZ SBN23.CHP.I.2018.SG.DC.CUR2 SBN23.CHP.I.2018.SG.DC.CUR3 SBN23.CHP.I.2018.SG.DC.CUSD SBN23.CHP.I.2018.SG.DC.CUSF SBN23.CHP.I.2018.SG.DC.CUR8 SBN23.CHP.I.2018.SG.DC.CMU4 SBN23.CHP.I.2018.SG.DC.CMUZ SBN23.CHP.I.2018.SG.DC.CUSL SBN23.CHP.I.2018.SG.DC.CUSN SBN23.CHP.I.2018.SG.DC.CUSQ SBN23.CHP.I.2018.SG.DC.CUSS SBN23.CHP.I.2018.SG.DC.CUS2 SBN23.CHP.I.2018.SG.DC.CUS3 SBN23.CHP.I.2018.SG.DC.CUS4 SBN23.CHP.I.2018.SG.DC.CUSU SBN23.CHP.I.2018.SG.DC.CUSW SBN23.CHP.I.2018.SG.DC.CUSY SBN23.CHP.I.2018.SG.DC.CUS5 SBN23.CHP.I.2018.SG.DC.CUS7 SBN23.CHP.I.2018.SG.DC.CUS9 SBN23.CHP.I.2018.SG.DC.CUTB SBN23.CHP.I.2018.SG.DC.CUTC SBN23.CHP.I.2018.SG.DC.CUSG SBN23.CHP.I.2018.SG.DC.CUR9 SBN23.CHP.I.2018.SG.DC.CUSA SBN23.CHP.I.2018.SG.DC.CUSB SBN23.CHC.I.2018.SG.DC.CUR6 SBN23.CHC.I.2018.SG.DC.CUSH

SBN23.CHC.I.2018.SG.DC.CUSJ SBN23.CHC.I.2018.SG.DC.CURY SBN23.CHC.I.2018.SG.DC.CUR4 SBN23.CHC.I.2018.SG.DC.CUSC

SBN23.CHC.I.2018.SG.DC.CUSE SBN23.CHC.I.2018.SG.DC.CMUY

SBN23.CHC.I.2018.SG.DC.CUSK SBN23.CHC.I.2018.SG.DC.CUSP

SBN23.CHP.I.2018.SG.DC.CUSR SBN23.CHP.I.2018.SG.DC.CUSZ SBN23.CHC.I.2018.SG.DC.CUST SBN23.CHC.I.2018.SG.DC.CUSX

SBN23.CHP.I.2018.SG.DC.CUS8 SBN23.CHP.I.2018.SG.DC.CUTA

SBN23.CHC.I.2018.SG.DC.CUS8 SBN23.CHP.I.2018.SG.DC.CUTA
SBN23.CHC.I.2018.SG.DC.CMUK RID23.PDS.NET.I.2018.SG.DC RID23.PDS.NET-

OON.I.2018.SG.DC RID23.PDS.NET-OON.I.2018.SG.DC.CUR7 RID23.PDS.NET-

OON.I.2018.SG.DC.CUR8 RID23.PDS.NET-OON.I.2018.SG.DC.CUR9

RID23.PDS.NET-OON.I.2018.SG.DC.CUSA RID23.PDS.NET-

OON.I.2018.SG.DC.CUSB RID23.PVCS.NET.I.2018.SG.DC RID23.PVCS.NET-

OON.I.2018.SG.DC RID23.RX.NET.I.2018.SG.DC RID23.RX.NET-OON.I.2018.SG.DC

SBN23.RX.NET.I.2018.SG.DC.55050%150

State: District of Columbia Filing Company: UnitedHealthcare Insurance Company

TOI/Sub-TOI: H16G Group Health - Major Medical/H16G.003G Small Group Only - Other

Product Name: DC-SG-UHIC-2024-01

Project Name/Number: /

SBN23.RX.NET.I.2018.SG.DC.155050%150 SBN23.RX.NET.I.2018.SG.DC.55080125 SBN23.RX.NET.I.2018.SG.DC.104075125 SBN23.RX.NET.I.2018.SG.DC.104075125 SBN23.RX.NET.I.2018.SG.DC.204575125 SBN23.RX.NET.I.2018.SG.DC.NONE

SBN23.RX.NET-OON.I.2018.SG.DC.1030% SBN23.RX.NET-

OON.I.2018.SG.DC.54075125 SBN23.RX.NET-OON.I.2018.SG.DC.55080125

SBN23.RX.NET-OON.I.2018.SG.DC.104075125 SBN23.RX.NET-

OON.I.2018.SG.DC.154075125 SBN23.RX.NET-OON.I.2018.SG.DC.155080125

SBN23.RX.NET-OON.I.2018.SG.DC.204575125 SBN23.RX.NET-

OON.I.2018.SG.DC.K61L SBN23.RX.NET-OON.I.2018.SG.DC.N43L SBN23.RX.NET-OON.I.2018.SG.DC.N45L SBN23.RX.NET-OON.I.2018.SG.DC.N45L SBN23.RX.NET-

OON.I.2018.SG.DC.N46L RID23.CARECASH.I.2018.SG.DC

Affected Forms:

Other Affected Forms:

## **REQUESTED RATE CHANGE INFORMATION:**

Change Period: Annual
Member Months: 138,218
Benefit Change: Increase

Percent Change Requested: Min: 3.8 Max: 10.2 Avg: 6.0

**PRIOR RATE:** 

Total Earned Premium: 85,321,042.00 Total Incurred Claims: 68,493,703.00

Annual \$: Min: 277.56 Max: 1,559.34 Avg: 617.29

**REQUESTED RATE:** 

Projected Earned Premium: 90,440,304.00 Projected Incurred Claims: 73,281,898.00

Annual \$: Min: 294.90 Max: 1,650.12 Avg: 654.33

State: District of Columbia Filing Company: UnitedHealthcare Insurance Company

TOI/Sub-TOI: H16G Group Health - Major Medical/H16G.003G Small Group Only - Other

Product Name: DC-SG-UHIC-2024-01

Project Name/Number: /

# Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		Rate Filing Exhibits		Revised	Previous State Filing Number: Percent Rate Change Request:	DC-SG-UHIC-Exhibits 2024-01.xlsx,

State: District of Columbia Filing Company: UnitedHealthcare Insurance Company

TOI/Sub-TOI: H16G Group Health - Major Medical/H16G.003G Small Group Only - Other

Product Name: DC-SG-UHIC-2024-01

Project Name/Number:

Attachment DC-SG-UHIC-Exhibits 2024-01.xlsx is not a PDF document and cannot be reproduced here.

State: District of Columbia Filing Company: UnitedHealthcare Insurance Company

**TOI/Sub-TOI:** H16G Group Health - Major Medical/H16G.003G Small Group Only - Other

Product Name: DC-SG-UHIC-2024-01

Project Name/Number: /

# **URRT**

**State Determination** 

Review Status: Incomplete

State: District of Columbia Filing Company: UnitedHealthcare Insurance Company

TOI/Sub-TOI: H16G Group Health - Major Medical/H16G.003G Small Group Only - Other

Product Name: DC-SG-UHIC-2024-01

Project Name/Number: /

# **URRT Items**

Item Name	Attachment(s)
Unified Rate Review Template	UnifiedRateReviewSubmission_2023050111312.xml
Actuarial Memorandum	DC_41842_UnitedHealthcare_Insurance_Company_SG_PartIII_2024Q1.pdf
Actuarial Memorandum - Redacted	DC_41842_UnitedHealthcare_Insurance_Company_SG_PartIII_2024Q1_Redacted.pdf
Consumer Justification Narrative	DC-SG-UHIC-PartII-2024.pdf

State: District of Columbia Filing Company: UnitedHealthcare Insurance Company

TOI/Sub-TOI: H16G Group Health - Major Medical/H16G.003G Small Group Only - Other

Product Name: DC-SG-UHIC-2024-01

Project Name/Number: /

Attachment UnifiedRateReviewSubmission\_2023050111312.xml is not a PDF document and cannot be reproduced here.

# Federal Rate Filing Justification Part III Actuarial Memorandum and Certification

**UnitedHealthcare Insurance Company** 

NAIC: 0707-41842

FEIN: 362739571

**District of Columbia Rate Review** 

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# **Section 1: Purpose**

The following is a rate filing prepared by UnitedHealthcare Insurance Company. This filing has been prepared to provide the necessary information required by the Department of Health and Human Services and the state of District of Columbia. The purpose of this memorandum is to provide information relevant to the Federal Part I Unified Rate Review Template (URRT).

This filing establishes rates intended to be used for non-grandfathered PPACA compliant small group health benefit plans sold on the Small Business Health Options Program in District of Columbia for the 2024 plan year. A rate increase is being filed at this time. The rates and other information in this submission are based on the current regulations and guidance from HHS. Changes to this filing may be necessary if there are revisions to the regulations or updated guidance from HHS.

This memorandum is intended solely for the information of and use by the Department of Health and Human Services and the District of Columbia Department of Insurance and Financial Services. It will demonstrate compliance with state and federal laws and regulations related to the development of the index rate and allowable rating factors and is not intended to be used for any other purpose.

The attached document contains confidential, proprietary information and trade secrets. This information is strictly confidential and protected from disclosure by D.C. Code section 31-3303.08(b) and D.C. Code section 2-534(a)(1). If the prohibition against disclosure by the Department of Insurance and Financial Services is reassessed at a later date, it may not be disclosed to any other state or federal regulatory agencies unless the recipient agrees in writing prior to receipt to maintain the confidentiality of the information.

## Section 2: General Information

## **Company Identifying Information**

Company Legal Name: UnitedHealthcare Insurance Company

State: District of Columbia

HIOS Issuer ID: 41842

Market: Small Business, 1-50
Proposed Effective Date: January 01, 2024

**Primary Contact Information** 

Name: Ryan Morgan, FSA, MAAA Email Address: ryan\_morgan2@uhc.com

# **Section 3: Proposed Rate Changes**

The proposed change in rates for this filing is 6.0% compared to the prior filing. The proposed pricing trend is 7.9% annually.

The primary drivers of the proposed rate changes are the following:

- Changes in medical service costs
  - Increasing Cost of Medical Services Annual increases in reimbursement rates to health care providers
     such as hospitals, doctors and pharmaceutical companies.
  - Increased Utilization The number of office visits and other services continues to grow. In addition, total health care spending will vary by the intensity of care and/or use of different types of health services. Patients who are sicker generally have a higher intensity of health care utilization. The price of care can be affected by the use of expensive procedures such as surgery vs. simply monitoring or providing medications.
  - Higher Costs from Deductible Leveraging Health care costs continue to rise every year. If deductibles and copayments remain the same, a greater percentage of health care costs need to be covered by health insurance premiums each year.
  - Cost shifting from the public to the private sector Reimbursements from the Center for Medicare and Medicaid Services (CMS) to hospitals do not generally cover all of the cost of care. The cost difference is being shifted to private health plans. Hospitals typically make up this difference by charging private health plans more.
  - O Impact of New Technology Improvements to medical technology and clinical practice often result in the use of more expensive services leading to increased health care spending and utilization.
- Administrative costs and anticipated profit
  - UnitedHealthcare works to directly control administrative expenses by adopting better processes and technology and through the development of programs and innovations that make health care more affordable. We have led the marketplace by introducing key innovations that make health care services more accessible and affordable for customers, improve the quality and coordination of health care services, and help individuals and their physicians make more informed health care decisions.
  - Additionally, UnitedHealthcare indirectly controls medical cost payments by using appropriate payment structures with providers and facilities. UnitedHealthcare's goal is to control costs, maximize efficiency, and work closely with physicians and providers to obtain the best value and coverage.
  - State and/or Federal government imposed taxation and fees are additional significant factors that impact health care spending. These fees include ACA taxes and fees which will have increased health insurance costs and need to be reflected in premium.
- Changes that vary by plan
  - All plan relativity factors have been updated to reflect UnitedHealthcare's most recent pricing model.
  - O The impact of any changes to plans that have occurred due to uniform modification are also reflected in the updated plan relativity factors. Please see the "Plan Adjusted Index Rate" section of the memorandum for more detail on these changes.

We refined the medical and pharmacy plan price relativities to reflect the most recent pricing methodology and pricing models. The methodology is based on UnitedHealthcare nationwide experience data, which contains utilization frequencies and unit costs by service category, in addition to claim distributions and adjustment factors for a large number of plan design variables. Benefit design parameters such as deductibles, coinsurance, copays, out-of-pocket maximums, etc. were input for each plan. The expected paid-to-allowed relativities and expected utilization differences due to differences in cost sharing for each plan are then used to develop the plan factors for each benefit plan. All benefit plans are priced consistently with each other, with the rates differing by the estimated value of the benefits and the expected utilization differences due to differences in cost sharing. The utilization differences do not reflect differences due to health status. The net impact of all changes by plan can be found in Worksheet 2, Section I of the Unified Rate Review Template.

Significant factors driving the proposed rate changes are discussed in further detail in Section 6 (*Projection Factors*) and Section 7 (*Credibility Manual Rate Development*) of this memorandum.

# Section 4: Experience and Current Period Premium, Claims and Enrollment

## Paid Through Date

The experience period is 1/1/2022 through 12/31/2022, with claims paid through 2/28/2023.

#### **Current Date**

The current enrollment and premium is reported as of 12/31/2022.

## Support for Estimate of Incurred but not Reported Claims

Historical claims are categorized both by the month in which they were incurred and the month in which they were adjudicated. For incurral months with sufficient adjudicated claim experience, incurred claims are estimated by applying completion factors derived from the historical claims. Adjustments are made based on specific knowledge of the entity (e.g., catastrophic claims, pended claims, etc.). For incurral months where adjudicated claim experience is not sufficient to rely on completion factors, a PMPM is used to estimate incurred claims. PMPM estimates are based on expected claim seasonality patterns, monthly calendar days and work days, emerging claim trends, and other factors. The same completion factors are applied to both incurred and allowed claim amounts.

The same completion factors are applied to both incurred and allowed claims amounts.

## **Experience Period Risk Adjustment**

Risk Adjustments for the experience period are not known at this time.

Our 2022 risk adjustment transfer PMPM is estimated using data provided to UnitedHealthcare as a result of our participation in a multi-state study done by a large, independent actuarial consulting firm. Based on the results of that study, we expect that risk level of the membership insured by UnitedHealthcare Insurance Company to be lower than the market. This results in an approximate adjustment of \$2.8 PMPM.

#### **Experience Period Index Rates**

Experience Period Index Rates are defined as the allowed claims PMPM for Essential Health Benefits during the Experience Period. With the breakout of service level EHB claims, the information provided reflects a reasonable estimate of the EHBs.

# **Section 5: Benefit Categories**

Claims were assigned to each of the benefit categories based on where services were administered and the types of medical services rendered. The benefit categories were defined by our claims department using standard industry definitions.

#### **Inpatient Hospital**

Includes non-capitated facility services for medical, surgical, maternity, mental health and substance abuse, skilled nursing, and other services provided in an inpatient facility setting and billed by the facility.

#### **Outpatient Hospital**

Includes non-capitated facility services for surgical, emergency room, laboratory, radiology, therapeutic, observation, and other services provided in an outpatient facility setting and billed by the facility.

## **Professional**

Includes non-capitated primary care, specialist care, therapeutic, the professional component of laboratory and radiology, and other professional services, other than hospital based professionals whose payments are included in facility fees.

## Other Medical

Includes non-capitated ambulatory, home health care, durable medical equipment, prosthetics, supplies, vision exams, dental services and other services.

## Capitation

Includes all services provided under one or more capitated agreements.

#### **Prescription Drug**

Includes drugs dispensed by a pharmacy. This amount is net of rebates received from drug manufacturers.

# **Section 6: Projection Factors**

#### <u>Trend</u>

Two years of annual trend were applied to our 2022 experience to project it to the 2024 rating period. Please see Exhibit T for more detail

UnitedHealthcare develops forward-looking medical expense estimates based on a number of considerations. In general, recent/emerging claims experience is reviewed at the market level for several broad medical expense categories (inpatient, professional, pharmacy, etc.), with utilization, unit cost, and benefit leveraging identified for each category. Future trends are developed based on a projection of each component.

Utilization rates by category are measured and projected. Forward looking utilization levels are developed based on emerging market level data, supplemented by regional and/or national level utilization data. Macro-economic data is often used to develop assumptions regarding directional changes in national health care consumption rates. UnitedHealthcare uses same store analysis to reflect utilization.

Market-level unit cost projections are developed based on evaluations of current and anticipated provider contract economics, as well as consideration to both current and expected changes in non-contracted provider cost exposure. Unit cost projections also consider the estimated cost impact of new technologies, service availability/mandates, or other factors that might influence the mix of procedures. Unit cost is based on our contractual changes with providers.

In addition, market-level healthcare affordability activities that are expected to impact forward-looking medical costs are recognized. Depending on the nature of individual initiatives, the impact may be recognized in one or more of the component cost items discussed above. Only incremental activities are recognized for this purpose in the expected trend impact for any particular period.

# Section 7: Credibility Manual Rate Development

## Adjustments Made to the Data

Adjustments similar to the ones described in Section 6 were applied to the experience of the credibility manual to project it to the projection period. In addition, the credibility manual was adjusted to reflect the average age, geography, plan design and morbidity of the adjusted experience period claims.

#### <u>Inclusion of Capitation Payments</u>

Capitation payments are included in both the experience and projections.

# **Section 8: Credibility of Experience**

We have set our rate levels based on the combined DC experience on our small group licenses, which we believe to be credible.

Consideration was given to ASOP #25 when determining the credibility and appropriateness of the experience and the manual rate.

# **Section 9: Development of Projected Index Rate**

The experience period index rate is \$578.44 PMPM.

The Index Rate For the experience period is approximately 99.92% of allowed claims due to benefits in excess of EHBs. The reported percentage amount is based on experience data. The index rate of the experience period has been reported accordingly. The Index Rate in the projection period represents 99.92% of allowed claims due to the benefits in excess of EHBs.

The projected index rate of \$549.13 was calculated by trending and adjusting the experience period index rate to the projection period, including blending the experience with a manual rate if the experience was not fully credible. It is established in accordance with the requirements of 45 CFR §156.80(d). See sections 6, 7, and 8 of this memo for more details.

# Section 10: Development of the Market Adjusted Index Rate

#### Risk Adjustment Payment/Charge

UnitedHealthcare Insurance Company anticipates paying an average of \$41.68 PMPM for risk adjustment transfers in the state of District of Columbia for the 2023 plan year, which has been grossed up to \$46.88 PMPM on an allowed basis for purposes of calculating the Market Adjusted Index Rate. We are assuming the risk level of our business relative to that of our competitors for the 2024 plan year will be similar to what it was in the 2022 plan year. Since risk adjustment transfer payments are a function of the market level premium, our 2024 risk adjustment transfer PMPM amount is calculated by adjusting our estimated 2022 risk adjustment transfer PMPM amount for the projected market level trend, changes in reinsurance fees and recoveries, and other adjustments based on the overall financial performance of the market.

#### **Exchange User Fees**

Marketplace user fees are applied as an adjustment to the Index Rate at the market level. The value reflects the expected mix of Marketplace and non-Marketplace enrollees.

The market adjusted index rate includes market-wide adjustments for reinsurance, risk adjustment transfers and exchange user fees (if any).

	Net Federal or	Risk Adjustment	Exchange Fee	
Index Rate	State Reinsurance	Payment/Charge	Adjustment	Market Adjusted
	(allowed basis)	(allowed basis)	(allowed basis)	Index Rate
\$549.13	\$0.00	(\$46.88)	0.00%	\$596.01

# **Section 11: Plan Adjusted Index Rate**

## **Actuarial Value and Cost Sharing Adjustment**

UnitedHealthcare has a proprietary pricing model that was used in developing the actuarial value and cost sharing adjustment for each plan. The model calculates plan relativity factors for medical and pharmacy benefits. Also included under the actuarial value and cost sharing adjustment are adjustments for leveraging and the difference between the average plan relativity factor and the projected paid to allowed ratio.

UnitedHealthcare does not utilize Induced Demand factors in our rate development. Instead, our plan-specific pricing factors are based on an analysis of UnitedHealthcare's nationwide block of Small Group health insurance, which reflects over 10 million member months of experience. Our approach complies with the prohibition of rating for morbidity differences by normalizing out the cost differences attributable to morbidity as measured by HHS's risk adjustment mechanism.

Historical UnitedHealthcare experience was used to develop the actuarial value and cost sharing adjustment.

## Provider network, delivery system and utilization management adjustment

Any adjustments for these items are included in the plan relativity factors.

## **Distribution and Administrative Costs**

Distribution and administrative costs include premium tax, risk adjustment user fees, SG&A, quality improvements, federal income tax, and after-tax income. Risk adjustment transfers, net reinsurance recoveries and exchange fees are excluded because they are accounted for in the market adjusted index rate.

#### Administrative Expense Load

The administrative expense load is a long-term estimate of administrative expenses, including selling expenses and general administrative expenses. This load does not vary by product or plan. These assumptions are based on the general ledger actual results for 2022 with known adjustments. Known adjustments include, but are not limited to, pay increases/raises for employees and administrative expenses as a result of Healthcare Reform and compliance requirements. The administrative expense allocation methodology used in pricing is appropriate because it is consistent with how UnitedHealthcare runs its business and how it allocates administrative costs for Statutory Filings and the Healthcare Reform Exhibits.

#### **Profit and Risk Margin**

The profit and risk margin is shown in Worksheet 2, Section III of the URRT. This target does not vary by product or plan.

The profit and risk margin is derived from the difference between the administrative expenses, taxes and fees, and 1 minus the target loss ratio and the administrative expenses, taxes and fees.

The profit and risk margin results in an anticipated MLR that is above the minimum requirements as described in the Projected Loss Ratio section.

#### **Taxes and Fees**

Taxes and fees are expected to be 4.0% and include premium tax, exchange fees (if any), risk adjustment user fees, and federal income tax. The following is a breakdown of the taxes and fees.

Premium Taxes and Fees Allocation	Estimated % of Premium
Federal / State Income Tax on Profit & Risk Load	0.6%
Premium Tax	1.8%
ACA Taxes: PCORI Fee	0.0%
ACA Taxes: Risk Adjustment User Fee	0.0%
ACA Taxes: Exchange User Fee	0.8%
All Other Taxes & Fees	0.6%
Total	4.0%

# **Section 12: Calibration**

Plan Adjusted Index Rates need to be calibrated to apply the allowable rating factors of age and geography in order to calculate the Consumer Adjusted Premium Rates. Calibration factors are applied uniformly to all plans.

#### **Age Calibration**

The calculated age curve calibration is 0.982, which equals one divided by the average age factor of the expected member distribution by age. The age factors used in this calculation are the DC-specified age curve.

## Geographic and Tobacco Calibration

Geographic and tobacco factors are not used in the rating of these products, and no calibration is needed.

Calibrating the plan adjusted index rate to the age curve and geographic distribution results in the calibrated premium rate for each plan. The calibrated premium rate represents the preliminary premium rate charged to an individual before applying the consumer specific rating adjustments for age and area.

# **Section 13: Consumer Adjusted Premium Rate Development**

The consumer adjusted premium rate is the final premium rate that is charged to an individual. It is developed by calibrating the plan adjusted index rate, and applying the consumer specific age and geographic rating factors. The calculation is provided below.

Plan Adjusted Index Rate

- x Age Calibration Factor
- x Geographic Calibration Factor
- x Consumer Specific Age Rating Factor
- x Consumer Specific Geographic Rating Factor
- x Small Group Trend Adjustment
- = Consumer Adjusted Premium Rate

# **Section 14: Projected Loss Ratio**

The projected loss ratio using the federally prescribed MLR methodology for calendar year 2024 is 85.0%. UnitedHealthcare Insurance Company agrees to comply with the rebate requirements of 45 CFR Part 158 should the actual market MLR fall below the 80.0% requirement.

## Section 15: AV Metal Values

The AV calculator used to calculate the AV metal values is based on a prescribed methodology and, therefore, does not necessarily reflect a reasonable estimate of the portion of allowed costs covered by the associated plan.

Some plans within this portfolio have cost sharing features that differ between individual and family coverage (i.e., when two or more people are covered by the plan). For all plans, consistent with the Actuarial Value Calculator inputs, we have used only the cost sharing provisions applicable for individuals in the actuarial value calculation.

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. Some of our plan designs are not directly compatible with the AV calculator. The values were developed in accordance with generally accepted actuarial principles and methodologies. Additional details are provided below to describe the types of adjustments that were made for plan designs that are not directly compatible with the AV calculator.

## Copays Paid in Conjunction with Coinsurance

Some of our plan designs include copays that are paid in conjunction with coinsurance in the coinsurance range. This benefit design is not directly compatible with the AV calculator, so the alternate methodology described in 45 CFR 156.135(b)(2) was used for the AV calculation. In order to modify the AV calculator input for a copay paid in conjunction with coinsurance, the following formula was used to estimate the insurer's cost share.

Effective Insurer Coinsurance Rate = (1 – Member Copay/Average Unit Cost) \* (1-Member Coinsurance Rate)

The benefit was then marked as "Subject to Deductible" and "Subject to Coinsurance" with a "Coinsurance, if different" equal to the effective insurer coinsurance rate as calculated above. The copay was entered in the "Copay if separate" column.

The average unit cost was calculated based on the claims data included within the AV calculator continuance tables for each metal level. For example, if the plan was expected to fall within a Silver Metal Tier, the average unit cost was calculated from the Silver continuance tables. All enrollees within a continuance table whose claims exceeded \$1,500 were included in the calculation of the average unit cost for each benefit type.

# Benefits that Vary Based on Place of Service

For some types of services, our plan designs include different benefit levels based on the place of service (i.e. physician's office, free standing facility, or outpatient hospital facility). To incorporate this differentiation in benefits, the Tiered Network Option was selected within the AV calculator, and utilization was assigned to each tier based on historical experience of affiliated carriers.

#### **Physician Tiering**

Select plan designs include lower cost sharing when members utilize providers we designate as meeting cost and efficiency standards. The tiered network functionality of the AV calculator was utilized to account for the cost sharing differences. The utilization of providers was based on a UnitedHealthcare study of differences in cost sharing and their effectiveness at driving utilization patterns.

## Per Occurrence Copays

Select plan designs have per occurrence copays where a copay is paid before coinsurance is applied between the deductible and maximum out of pocket. These copays accumulate to the maximum out of pocket. To reflect this type of benefit an effective insurer coinsurance rate was calculated based on the average unit cost of the service and member coinsurance rate. The calculation is as follows:

Effective Insurer Coinsurance Rate = (1 – Member Copay/Average Unit Cost) \* (1-Member Coinsurance Rate)

Some of the copays only apply to portions of the benefit categories that the AV calculator defines. For example, the Inpatient Hospital Services includes both physician and facility charges. To the extent the plan design per occurrence copay only applies to a portion of the services, the tiered Network functionality was utilized. The mix of services within the AV calculator benefit categories was based on historical experience.

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# **Section 16: Membership Projections**

The 2024 plan year membership projection was developed utilizing the experience period plan level membership distribution along with sales and persistency targets. Member distribution by plan was then based on current enrollment, taking into consideration changes in the portfolio of plans to be offered in 2024. Strictly for purposes of the URRT, we have projected membership by plan.

# **Section 17: Terminated Plans and Products**

There are no terminated plans or products for this legal entity.

# **Section 18: Plan Type**

Plan types of POS and EPO have been selected, which describes the plans exactly.

# **Section 19: Reliance**

In my professional judgment, the assumptions or methods described in the memorandum do not conflict with what I believe to be reasonable. Therefore, I have not included any reliances.

## **Section 20: Actuarial Certification**

I, Ryan Morgan, FSA, MAAA, am a Director, Actuarial Services for UnitedHealthcare, and a member of the American Academy of Actuaries. I meet the Academy's qualification standards for rendering statements of actuarial opinion with respect to the filing of rates for health insurance products.

To the best of my knowledge and judgment, I certify that:

- The index rate and only the allowable modifiers as described in 45 CFR 156.80(d)(1) and 45 CFR 156.80(d)(2) were used to generate plan level rates.
- The geographic rating factors reflect only differences in the costs of delivery and do not include differences for population morbidity by geographic area.
- The AV calculator was used to determine the AV metal values shown in Worksheet 2 of the Part I Unified
  Rate Review Template for all plans. Some of our plan designs are not directly compatible with the AV
  calculator. The values were developed in accordance with generally accepted actuarial principles and
  methodologies. The unique plan design actuarial certification required by 45 CFR Part 156.135.
- The Part I Unified Rate Review Template does not demonstrate the process used by the issuer to develop
  their 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 exchanges, and for
  certification that the index rate is developed in accordance with federal regulation and used consistently
  and only adjusted by the allowable modifiers.

Ryan Morgan	5/1/2023
Ryan Morgan, FSA, MAAA	Date
Director, Actuarial Services	

# Federal Rate Filing Justification Part III Actuarial Memorandum and Certification

**UnitedHealthcare Insurance Company** 

NAIC: 0707-41842

FEIN: 362739571

**District of Columbia Rate Review** 

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# **Section 1: Purpose**

The following is a rate filing prepared by UnitedHealthcare Insurance Company. This filing has been prepared to provide the necessary information required by the Department of Health and Human Services and the state of District of Columbia. The purpose of this memorandum is to provide information relevant to the Federal Part I Unified Rate Review Template (URRT).

This filing establishes rates intended to be used for non-grandfathered PPACA compliant small group health benefit plans sold on the Small Business Health Options Program in District of Columbia for the 2024 plan year. A rate increase is being filed at this time. The rates and other information in this submission are based on the current regulations and guidance from HHS. Changes to this filing may be necessary if there are revisions to the regulations or updated guidance from HHS.

This memorandum is intended solely for the information of and use by the Department of Health and Human Services and the District of Columbia Department of Insurance and Financial Services. It will demonstrate compliance with state and federal laws and regulations related to the development of the index rate and allowable rating factors and is not intended to be used for any other purpose.

The attached document contains confidential, proprietary information and trade secrets. This information is strictly confidential and protected from disclosure by D.C. Code section 31-3303.08(b) and D.C. Code section 2-534(a)(1). If the prohibition against disclosure by the Department of Insurance and Financial Services is reassessed at a later date, it may not be disclosed to any other state or federal regulatory agencies unless the recipient agrees in writing prior to receipt to maintain the confidentiality of the information.

# **Section 2: General Information**

## **Company Identifying Information**

Company Legal Name: UnitedHealthcare Insurance Company

State: District of Columbia

HIOS Issuer ID: 41842

Market: Small Business, 1-50
Proposed Effective Date: January 01, 2024

**Primary Contact Information** 

Name:

**Email Address:** 

# **Section 3: Proposed Rate Changes**

The proposed change in rates for this filing is compared to the prior filing. The proposed pricing trend is annually.

The primary drivers of the proposed rate changes are the following:

- Changes in medical service costs
  - Increasing Cost of Medical Services Annual increases in reimbursement rates to health care providers
     such as hospitals, doctors and pharmaceutical companies.
  - Increased Utilization The number of office visits and other services continues to grow. In addition, total health care spending will vary by the intensity of care and/or use of different types of health services. Patients who are sicker generally have a higher intensity of health care utilization. The price of care can be affected by the use of expensive procedures such as surgery vs. simply monitoring or providing medications.
  - Higher Costs from Deductible Leveraging Health care costs continue to rise every year. If deductibles and copayments remain the same, a greater percentage of health care costs need to be covered by health insurance premiums each year.
  - Cost shifting from the public to the private sector Reimbursements from the Center for Medicare and Medicaid Services (CMS) to hospitals do not generally cover all of the cost of care. The cost difference is being shifted to private health plans. Hospitals typically make up this difference by charging private health plans more.
  - Impact of New Technology Improvements to medical technology and clinical practice often result in the use of more expensive services - leading to increased health care spending and utilization.
- Administrative costs and anticipated profit
  - UnitedHealthcare works to directly control administrative expenses by adopting better processes and technology and through the development of programs and innovations that make health care more affordable. We have led the marketplace by introducing key innovations that make health care services more accessible and affordable for customers, improve the quality and coordination of health care services, and help individuals and their physicians make more informed health care decisions.
  - Additionally, UnitedHealthcare indirectly controls medical cost payments by using appropriate payment structures with providers and facilities. UnitedHealthcare's goal is to control costs, maximize efficiency, and work closely with physicians and providers to obtain the best value and coverage.
  - State and/or Federal government imposed taxation and fees are additional significant factors that impact health care spending. These fees include ACA taxes and fees which will have increased health insurance costs and need to be reflected in premium.
- Changes that vary by plan
  - All plan relativity factors have been updated to reflect UnitedHealthcare's most recent pricing model.
  - The impact of any changes to plans that have occurred due to uniform modification are also reflected in the updated plan relativity factors. Please see the "Plan Adjusted Index Rate" section of the memorandum for more detail on these changes.

We refined the medical and pharmacy plan price relativities to reflect the most recent pricing methodology and pricing models. The methodology is based on UnitedHealthcare nationwide experience data, which contains utilization frequencies and unit costs by service category, in addition to claim distributions and adjustment factors for a large number of plan design variables. Benefit design parameters such as deductibles, coinsurance, copays, out-of-pocket maximums, etc. were input for each plan. The expected paid-to-allowed relativities and expected utilization differences due to differences in cost sharing for each plan are then used to develop the plan factors for each benefit plan. All benefit plans are priced consistently with each other, with the rates differing by the estimated value of the benefits and the expected utilization differences due to differences in cost sharing. The utilization differences do not reflect differences due to health status. The net impact of all changes by plan can be found in Worksheet 2, Section I of the Unified Rate Review Template.

Significant factors driving the proposed rate changes are discussed in further detail in Section 6 (*Projection Factors*) and Section 7 (*Credibility Manual Rate Development*) of this memorandum.

# Section 4: Experience and Current Period Premium, Claims and Enrollment

## Paid Through Date

The experience period is

#### **Current Date**

The current enrollment and premium is reported as of

# Support for Estimate of Incurred but not Reported Claims

Historical claims are categorized both by the month in which they were incurred and the month in which they were adjudicated. For incurral months with sufficient adjudicated claim experience, incurred claims are estimated by applying completion factors derived from the historical claims. Adjustments are made based on specific knowledge of the entity (e.g., catastrophic claims, pended claims, etc.). For incurral months where adjudicated claim experience is not sufficient to rely on completion factors, a PMPM is used to estimate incurred claims. PMPM estimates are based on expected claim seasonality patterns, monthly calendar days and work days, emerging claim trends, and other factors. The same completion factors are applied to both incurred and allowed claim amounts.

The same completion factors are applied to both incurred and allowed claims amounts.

#### **Experience Period Risk Adjustment**

Risk Adjustments for the experience period are not known at this time.

Our 2022 risk adjustment transfer PMPM is estimated using data provided to UnitedHealthcare as a result of our participation in a multi-state study done by a large, independent actuarial consulting firm. Based on the results of that study, we expect that risk level of the membership insured by UnitedHealthcare Insurance Company to be lower than the market. This results in an approximate adjustment of

#### **Experience Period Index Rates**

Experience Period Index Rates are defined as the allowed claims PMPM for Essential Health Benefits during the Experience Period. With the breakout of service level EHB claims, the information provided reflects a reasonable estimate of the EHBs.

# **Section 5: Benefit Categories**

Claims were assigned to each of the benefit categories based on where services were administered and the types of medical services rendered. The benefit categories were defined by our claims department using standard industry definitions.

#### Inpatient Hospital

Includes non-capitated facility services for medical, surgical, maternity, mental health and substance abuse, skilled nursing, and other services provided in an inpatient facility setting and billed by the facility.

## **Outpatient Hospital**

Includes non-capitated facility services for surgical, emergency room, laboratory, radiology, therapeutic, observation, and other services provided in an outpatient facility setting and billed by the facility.

## **Professional**

Includes non-capitated primary care, specialist care, therapeutic, the professional component of laboratory and radiology, and other professional services, other than hospital based professionals whose payments are included in facility fees.

## Other Medical

Includes non-capitated ambulatory, home health care, durable medical equipment, prosthetics, supplies, vision exams, dental services and other services.

## Capitation

Includes all services provided under one or more capitated agreements.

## **Prescription Drug**

Includes drugs dispensed by a pharmacy. This amount is net of rebates received from drug manufacturers.

# **Section 6: Projection Factors**

Trend

Two years of annual trend were applied to our Exhibit T for more detail rating period. Please see

UnitedHealthcare develops forward-looking medical expense estimates based on a number of considerations. In general, recent/emerging claims experience is reviewed at the market level for several broad medical expense categories (inpatient, professional, pharmacy, etc.), with utilization, unit cost, and benefit leveraging identified for each category. Future trends are developed based on a projection of each component.

Utilization rates by category are measured and projected. Forward looking utilization levels are developed based on emerging market level data, supplemented by regional and/or national level utilization data. Macro-economic data is often used to develop assumptions regarding directional changes in national health care consumption rates. UnitedHealthcare uses same store analysis to reflect utilization.

Market-level unit cost projections are developed based on evaluations of current and anticipated provider contract economics, as well as consideration to both current and expected changes in non-contracted provider cost exposure. Unit cost projections also consider the estimated cost impact of new technologies, service availability/mandates, or other factors that might influence the mix of procedures. Unit cost is based on our contractual changes with providers.

In addition, market-level healthcare affordability activities that are expected to impact forward-looking medical costs are recognized. Depending on the nature of individual initiatives, the impact may be recognized in one or more of the component cost items discussed above. Only incremental activities are recognized for this purpose in the expected trend impact for any particular period.

# **Section 7: Credibility Manual Rate Development**

#### Adjustments Made to the Data

Adjustments similar to the ones described in Section 6 were applied to the experience of the credibility manual to project it to the projection period. In addition, the credibility manual was adjusted to reflect the average age, geography, plan design and morbidity of the adjusted experience period claims.

#### **Inclusion of Capitation Payments**

Capitation payments are included in both the experience and projections.

# **Section 8: Credibility of Experience**

We have set our rate levels based on the combined DC experience on our small group licenses, which we believe to be credible.

Consideration was given to ASOP #25 when determining the credibility and appropriateness of the experience and the manual rate.

# Sec

ction 9: Development of Projected Index Rate  The experience period index rate is
The Index Rate For the experience period is approximately of allowed claims due to benefits in excess of EHBs. The reported percentage amount is based on experience data. The index rate of the experience period has been reported accordingly. The Index Rate in the projection period represents of allowed claims due to the benefits in excess of EHBs.
The projected index rate of was calculated by trending and adjusting the experience period index rate to the projection period, including blending the experience with a manual rate if the experience was not fully credible. It is established in accordance with the requirements of 45 CFR §156.80(d). See sections 6, 7, and 8 of this memo for more details.

# Section 10: Development of the Market Adjusted Index Rate

#### Risk Adjustment Payment/Charge

UnitedHealthcare Insurance Company anticipates paying an average of for risk adjustment transfers in the state of District of Columbia for the 2023 plan year, which has been grossed up to on an allowed basis for purposes of calculating the Market Adjusted Index Rate. We are assuming the risk level of our business relative to that of our competitors for the 2024 plan year will be similar to what it was in the 2022 plan year. Since risk adjustment transfer payments are a function of the market level premium, our 2024 risk adjustment transfer PMPM amount is calculated by adjusting our estimated 2022 risk adjustment transfer PMPM amount for the projected market level trend, changes in reinsurance fees and recoveries, and other adjustments based on the overall financial performance of the market.

#### **Exchange User Fees**

Marketplace user fees are applied as an adjustment to the Index Rate at the market level. The value reflects the expected mix of Marketplace and non-Marketplace enrollees.

The market adjusted index rate includes market-wide adjustments for reinsurance, risk adjustment transfers and exchange user fees (if any).

## **Section 11: Plan Adjusted Index Rate**

#### Actuarial Value and Cost Sharing Adjustment

UnitedHealthcare has a proprietary pricing model that was used in developing the actuarial value and cost sharing adjustment for each plan. The model calculates plan relativity factors for medical and pharmacy benefits. Also included under the actuarial value and cost sharing adjustment are adjustments for leveraging and the difference between the average plan relativity factor and the projected paid to allowed ratio.

UnitedHealthcare does not utilize Induced Demand factors in our rate development. Instead, our plan-specific pricing factors are based on an analysis of UnitedHealthcare's nationwide block of Small Group health insurance, which reflects months of experience. Our approach complies with the prohibition of rating for morbidity differences by normalizing out the cost differences attributable to morbidity as measured by HHS's risk adjustment mechanism.

Historical UnitedHealthcare experience was used to develop the actuarial value and cost sharing adjustment.

#### Provider network, delivery system and utilization management adjustment

Any adjustments for these items are included in the plan relativity factors.

#### **Distribution and Administrative Costs**

Distribution and administrative costs include premium tax, risk adjustment user fees, SG&A, quality improvements, federal income tax, and after-tax income. Risk adjustment transfers, net reinsurance recoveries and exchange fees are excluded because they are accounted for in the market adjusted index rate.

#### Administrative Expense Load

The administrative expense load is a long-term estimate of administrative expenses, including selling expenses and general administrative expenses. This load does not vary by product or plan. These assumptions are based on the general ledger actual results for 2022 with known adjustments. Known adjustments include, but are not limited to, pay increases/raises for employees and administrative expenses as a result of Healthcare Reform and compliance requirements. The administrative expense allocation methodology used in pricing is appropriate because it is consistent with how UnitedHealthcare runs its business and how it allocates administrative costs for Statutory Filings and the Healthcare Reform Exhibits.

#### **Profit and Risk Margin**

The profit and risk margin is shown in Worksheet 2, Section III of the URRT. This target does not vary by product or plan.

The profit and risk margin is derived from the difference between the administrative expenses, taxes and fees, and 1 minus the target loss ratio and the administrative expenses, taxes and fees.

The profit and risk margin results in an anticipated MLR that is above the minimum requirements as described in the Projected Loss Ratio section.

#### **Taxes and Fees**

Taxes and fees are expected to be and include premium tax, exchange fees (if any), risk adjustment user fees, and federal income tax. The following is a breakdown of the taxes and fees.



#### **Section 12: Calibration**

Plan Adjusted Index Rates need to be calibrated to apply the allowable rating factors of age and geography in order to calculate the Consumer Adjusted Premium Rates. Calibration factors are applied uniformly to all plans.

#### **Age Calibration**

The calculated age curve calibration is which equals one divided by the average age factor of the expected member distribution by age. The age factors used in this calculation are the DC-specified age curve.

#### Geographic and Tobacco Calibration

Geographic and tobacco factors are not used in the rating of these products, and no calibration is needed.

Calibrating the plan adjusted index rate to the age curve and geographic distribution results in the calibrated premium rate for each plan. The calibrated premium rate represents the preliminary premium rate charged to an individual before applying the consumer specific rating adjustments for age and area.

# **Section 13: Consumer Adjusted Premium Rate Development**

The consumer adjusted premium rate is the final premium rate that is charged to an individual. It is developed by calibrating the plan adjusted index rate, and applying the consumer specific age and geographic rating factors. The calculation is provided below.

Plan Adjusted Index Rate

- x Age Calibration Factor
- x Geographic Calibration Factor
- x Consumer Specific Age Rating Factor
- x Consumer Specific Geographic Rating Factor
- x Small Group Trend Adjustment
- = Consumer Adjusted Premium Rate

# **Section 14: Projected Loss Ratio**

The projected loss ratio using the federally prescribed MLR methodology for calendar year 2024 is UnitedHealthcare Insurance Company agrees to comply with the rebate requirements of 45 CFR Part 158 should the actual market MLR fall below the 80.0% requirement.

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# **Section 18: Plan Type**

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#### **Section 19: Reliance**

In my professional judgment, the assumptions or methods described in the memorandum do not conflict with what I believe to be reasonable. Therefore, I have not included any reliances.

#### **Section 20: Actuarial Certification**

I, am a Director, Actuarial Services for UnitedHealthcare, and a member of the American Academy of Actuaries. I meet the Academy's qualification standards for rendering statements of actuarial opinion with respect to the filing of rates for health insurance products.

To the best of my knowledge and judgment, I certify that:

- The index rate and only the allowable modifiers as described in 45 CFR 156.80(d)(1) and 45 CFR 156.80(d)(2) were used to generate plan level rates.
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  review of rate increases, for certification of qualified health plans for federally facilitated exchanges, and for
  certification that the index rate is developed in accordance with federal regulation and used consistently
  and only adjusted by the allowable modifiers.





# UnitedHealthcare Insurance Company DC Small Group 2024 Non-Grandfathered Employer Rates

#### Scope and Range of the Rate Increase

The requested average rate change for the small group health benefit plans sold in the District of Columbia is +6.0%, though rate changes may range from +3.8% to +10.1% depending on the specific plan. Additional premium changes may occur due to member aging and changes in plan selection. Rate changes will be effective January 1, 2024. It is projected that there will be 10,812 covered lives impacted by this rate change.

#### **Changes in Medical Service Costs**

There are many different health care cost trends that contribute to increases in the overall U.S. health care spending each year. These trend factors affect health insurance premiums, which can mean a premium rate increase to cover costs. Some of the key health care cost trends that have affected this year's rate actions include:

- **Increasing Cost of Medical Services**: Annual increases in reimbursement rates to health care providers such as hospitals, doctors, and pharmaceutical companies.
- **Increased Utilization**: The number of office visits and other services continues to grow. In addition, total health care spending will vary by the intensity of care and use of different types of health services. The price of care can be affected by the use of expensive procedures such as surgery versus simply monitoring or providing medications.
- **Higher Costs from Deductible Leveraging**: While health care costs continue to rise every year, if deductibles and copayments remain the same, a greater percentage of health care costs need to be covered by health insurance premiums each year.
- Cost shifting from the public to the private sector: Reimbursements from the Center for Medicare and Medicaid Services (CMS) to hospitals do not generally cover the cost of providing care to these patients. Hospitals generally make up this reimbursement shortfall by charging private health plans more.
- **Impact of New Technology**: Improvements to medical technology and clinical practice require use of more expensive services leading to increased health care spending and utilization.

#### **Changes in Benefits**

Changes in covered benefits or benefit plan designs impact costs and therefore affect premium changes. Benefit plans are typically changed for one of three reasons: to comply with the requirements of the Affordable Care Act, to respond to consumer feedback, or to address a particular medical cost issue to provide for greater long-term affordability of the product.

The Affordable Care Act implemented requirements for the "value" that must be offered by plan designs in the Individual and Small Group markets. These are called "metal levels". For a benefit plan to remain classified within a particular metal level from year to year, adjustments to deductibles, copayments or coinsurance are sometimes required. These adjustments impact the cost and therefore the premium increases for the plan.

#### **Administrative Costs**

UnitedHealthcare works to directly control administrative expenses by adopting better processes and technology and developing programs and innovations that make health care more affordable. We have led the marketplace by introducing key innovations that make health care services more accessible and affordable for customers, improve the quality and coordination of health care services, and help individuals and their physicians make more informed health care decisions. Updated analysis of administrative costs has shown that the administrative costs associated with these plans are higher than previously estimated and those costs are included in the requested rate change.

State and Federal government imposed taxation and fees are significant factors that impact health care spending and have to be included in the administrative costs associated with the plans. These fees include Patient Protection and Affordable Care Act taxes and fees which impact health insurance costs and need to be reflected in premium.

SERFF Tracking #: UHLC-133628683 State Tracking #: Company Tracking #:

State: District of Columbia Filing Company: UnitedHealthcare Insurance Company

TOI/Sub-TOI: H16G Group Health - Major Medical/H16G.003G Small Group Only - Other

Product Name: DC-SG-UHIC-2024-01

Project Name/Number: /

# **Supporting Document Schedules**

Satisfied - Item:	Actuarial Justification
Comments:	
Attachment(s):	DC-SG-UHIC-PartII-2024.pdf
Item Status:	
Status Date:	
Bypassed - Item:	Certificate of Authority to File
Bypass Reason:	NA NA
Attachment(s):	
Item Status:	
Status Date:	
Satisfied - Item:	Cover Letter
Comments:	COVER LETTER
Attachment(s):	DC-SG-UHIC-Cover-2024.pdf
Item Status:	DO-3G-OT IIC-COVET-2024.pdi
Status Date:	
Otatas Bato.	
Satisfied - Item:	DISB Actuarial Memorandum Dataset
Comments:	
Attachment(s):	DC-SG-UHIC-ActuarialDataset-2024.xlsx
Item Status:	
Status Date:	
Bypassed - Item:	District of Columbia and Countrywide Experience for the Last 5 Years (P&C)
Bypass Reason:	NA
Attachment(s):	I VA
Item Status:	
Status Date:	
Bypassed - Item:	District of Columbia and Countrywide Loss Ratio Analysis (P&C)
Bypass Reason:	NA
Attachment(s):	
Item Status:	
Status Date:	

SERFF Tracking #: UHLC-133628683 State Tracking #: Company Tracking #:

State: District of Columbia Filing Company: UnitedHealthcare Insurance Company

TOI/Sub-TOI: H16G Group Health - Major Medical/H16G.003G Small Group Only - Other Product Name: DC-SG-UHIC-2024-01

Project Name/Number: /

Satisfied - Item:	District of Oak and a District and a constant
	District of Columbia Plain Language Summary
Comments:	
Attachment(s):	DC-SG-UHIC-PlainLanguageSummary-2024.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Rate Review Checklist
Comments:	
Attachment(s):	DC-SG-Checklist-2024.pdf
Item Status:	
Status Date:	
Satisfied - Item:	AV Screenshots
Comments:	
Attachment(s):	2024 DC SG AV Screenshots_UHIC.zip 2024 DC SG Standard Plans AV Screenshots UHIC.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Risk Adjustment RATEE Data
Comments:	The risk adjustment RATEE Data is not currently available. We will amend when we have the available information.
Attachment(s):	
Item Status:	
Status Date:	
Satisfied - Item:	Rate Sheets
Comments:	
Attachment(s):	DC_41842_UHIC_On_SG_2024_RTT_ 04-26-2023.xlsm
Item Status:	
Status Date:	
Satisfied - Item:	Unique Plan Design
Comments:	
Attachment(s):	DC-UHIC-Unique Plan Design 2024 Signed.pdf
Item Status:	
Status Date:	

SERFF Tracking #: State Tracking #: Company Tracking #: UHLC-133628683 Filing Company: State: District of Columbia UnitedHealthcare Insurance Company TOI/Sub-TOI: H16G Group Health - Major Medical/H16G.003G Small Group Only - Other Product Name: DC-SG-UHIC-2024-01 Project Name/Number: Satisfied - Item: Actuarial Memorandum **Comments:** Attachment(s): DC-SG-UHIC-ActMemo-2024.pdf **Item Status: Status Date:** Satisfied - Item: Unified Rate Review Template Comments: Attachment(s): 2024\_Unified\_Rate\_Review\_Template\_v6.0\_UHIC.xlsm **Item Status:** 

**Status Date:** 

SERFF Tracking #: UHLC-133628683 State Tracking #: Company Tracking #: Company Tracking #:

State: District of Columbia Filing Company: UnitedHealthcare Insurance Company

TOI/Sub-TOI: H16G Group Health - Major Medical/H16G.003G Small Group Only - Other

**Product Name:** DC-SG-UHIC-2024-01

Project Name/Number: /

Attachment DC-SG-UHIC-ActuarialDataset-2024.xlsx is not a PDF document and cannot be reproduced here.

Attachment 2024 DC SG AV Screenshots\_UHIC.zip is not a PDF document and cannot be reproduced here.

Attachment DC\_41842\_UHIC\_On\_SG\_2024\_RTT\_ 04-26-2023.xlsm is not a PDF document and cannot be reproduced here.

Attachment 2024\_Unified\_Rate\_Review\_Template\_v6.0\_UHIC.xlsm is not a PDF document and cannot be reproduced here.

# UnitedHealthcare Insurance Company DC Small Group 2024 Non-Grandfathered Employer Rates

#### Scope and Range of the Rate Increase

The requested average rate change for the small group health benefit plans sold in the District of Columbia is +6.0%, though rate changes may range from +3.8% to +10.1% depending on the specific plan. Additional premium changes may occur due to member aging and changes in plan selection. Rate changes will be effective January 1, 2024. It is projected that there will be 10,812 covered lives impacted by this rate change.

#### **Changes in Medical Service Costs**

There are many different health care cost trends that contribute to increases in the overall U.S. health care spending each year. These trend factors affect health insurance premiums, which can mean a premium rate increase to cover costs. Some of the key health care cost trends that have affected this year's rate actions include:

- **Increasing Cost of Medical Services**: Annual increases in reimbursement rates to health care providers such as hospitals, doctors, and pharmaceutical companies.
- **Increased Utilization**: The number of office visits and other services continues to grow. In addition, total health care spending will vary by the intensity of care and use of different types of health services. The price of care can be affected by the use of expensive procedures such as surgery versus simply monitoring or providing medications.
- **Higher Costs from Deductible Leveraging**: While health care costs continue to rise every year, if deductibles and copayments remain the same, a greater percentage of health care costs need to be covered by health insurance premiums each year.
- Cost shifting from the public to the private sector: Reimbursements from the Center for Medicare and Medicaid Services (CMS) to hospitals do not generally cover the cost of providing care to these patients. Hospitals generally make up this reimbursement shortfall by charging private health plans more.
- **Impact of New Technology**: Improvements to medical technology and clinical practice require use of more expensive services leading to increased health care spending and utilization.

#### **Changes in Benefits**

Changes in covered benefits or benefit plan designs impact costs and therefore affect premium changes. Benefit plans are typically changed for one of three reasons: to comply with the requirements of the Affordable Care Act, to respond to consumer feedback, or to address a particular medical cost issue to provide for greater long-term affordability of the product.

The Affordable Care Act implemented requirements for the "value" that must be offered by plan designs in the Individual and Small Group markets. These are called "metal levels". For a benefit plan to remain classified within a particular metal level from year to year, adjustments to deductibles, copayments or coinsurance are sometimes required. These adjustments impact the cost and therefore the premium increases for the plan.

#### **Administrative Costs**

UnitedHealthcare works to directly control administrative expenses by adopting better processes and technology and developing programs and innovations that make health care more affordable. We have led the marketplace by introducing key innovations that make health care services more accessible and affordable for customers, improve the quality and coordination of health care services, and help individuals and their physicians make more informed health care decisions. Updated analysis of administrative costs has shown that the administrative costs associated with these plans are higher than previously estimated and those costs are included in the requested rate change.

State and Federal government imposed taxation and fees are significant factors that impact health care spending and have to be included in the administrative costs associated with the plans. These fees include Patient Protection and Affordable Care Act taxes and fees which impact health insurance costs and need to be reflected in premium.



May 1, 2023

Efren Tanhehco, Actuary
DC Department of Insurance Securities & Banking
810 First Street, NE Suite 701
Washington, DC 20002

Re: UnitedHealthcare Insurance Company

Small Group Rate Filing

Dear Mr. Tanhehco:

This rate filing presents proposed premium rates effective January 1, 2024 through December 31, 2024 for medical and Rx benefit plans to be sold by the UnitedHealthcare Insurance Company to small group employers. The benefit plans and rates are for non-grandfathered employers.

A. Company Name: UnitedHealthcare Insurance Company

B. NAIC Company Code: 79413

C. SERFF Tracking #: UHLC-133628683

D. Date Filing Submitted: 5/1/2023

E. Proposed Effective Date: 1/1/2024

F. Type of Product: Medical and prescription drug insurance, offered both in-network only and in-network with out-of-network benefits.

G. Market: Small group, employers with 50 or fewer eligible employees.

H. Scope and Purpose of Filing: 2024 rates for small group plans meeting the requirements of the Patient Protection and Affordable Care Act (PPACA).

I. Initial Filing or Rate Change: Initial filing for 2024, rate change to previously filed and approved 2023 rates.

J. Rates apply to existing DC policyholders.

K. Overall Premium Impact of Filing on DC Policyholders: An average 6.0% renewal rate increase.

L. Contact Information: Ryan Morgan, Email: ryan morgan2@uhc.com.

If you have any questions, please do not hesitate to reach out.

Sincerely,

Ryan Morgan, FSA, MAAA Director, Actuarial Services

Ryan Morgan

#### 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	UnitedHealthcar	e Insurance Company	
SERFF tracking number	UHLC-1336286	83	
Submission Date	May 1, 2023		
Product Name	Medical and Pre	escription Drug Insurance	
Market Type	Individual	Small Group	
Rate Filing Type	Rate Increase	New Filing	
Scope and Range of the	Increase:		
The 6.0 % increase is requested because:			
The biggest driver of our rate increase is trend.			

This filing will impact:

# of policyholder's 1995 # of covered lives 10812

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 6.0 %
- Minimum Rate Change: The smallest premium increase (or largest decrease), by percentage, that any one policy holder would experience if the filing is approved 3.9 %
- Maximum Rate Change: The largest premium increase, by percentage, that any one policy holder would experience if the filing is approved 10.1%

Individuals within the group may vary from the aggregate of the above increase components as a result of:

The group's rate is based on the benefit plan selected and the attained ages of the members at the beginning of the policy period.

#### **Financial Experience of Product**

The overall financial experience of the product includes:

Membership steady. In part due to inflation, trend rate needed is greater than what was approved in our 2023 rate filing.

The rate increase will affect the projected financial experience of the product by:

The projected loss ratio using the Federal prescribed MLR methodology is 85.0%

#### **Components of Increase**

The request is made up of the following components:

Trend Increases -7.3 % of the 6.0 % 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 3.7 % of the 6.0 % 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 3.4 % of the 6.0 % total filed increase.

Other Increases – -1.3 % of the 6.0 % 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 % of the % 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 % of the % 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 % of the % 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 % of the % total filed increase.

5. Other – Defined as:

Base rate change (due to experience, risk adj, etc), plan changes, trend updates.

This component is -1.3 % of the 6.0 % total filed increase.

# 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 Memorandum should be consistent with the cover letter, if applicable.

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	Actuarial Memo
2	Form Numbers	Form numbers should be listed in the actuarial memorandum.	Yes	Actuarial Memo
3	HIOS Product ID	The HIOS product ID should be listed in the actuarial memorandum.	Yes	Actuarial Memo
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	Actuarial Memo
5	Market	Indicate whether the products are sold in the individual or small employer group market.	Yes	Actuarial Memo
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	Actuarial Memo
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	Actuarial Memo

Number	Data Element	Requirement Description	Individual and Sma	all 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	Exhibit 1
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	Actuarial Memo
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	Actuarial Memo
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	Actuarial Memo
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	Actuarial Memo
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	Actuarial Memo
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	Actuarial Memo
14	Exposure	Current number of policies, certificates and covered lives.	Yes	Actuarial Memo

Number	Data Element	Requirement Description	Individual and Small Group	
			Has the Data Element Been Included?	Location of the Data Element
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	Exhibit A
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	Exhibit A
17	Index Rate	Provide the index rate.	Yes	Actuarial Memo
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	Actuarial Memo
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	Actuarial Memo
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	Exhibit T
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	Actuarial Memo Exhibit 4
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.	Yës	Actuarial Memo Exhibit 4

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.	Yes	Actuarial Memo Exhibit 3
		For initial filings, provide the derivation of any new plan factors.		
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	Actuarial Memo Exhibit 1 Exhibit 3
23.1	Wellness Programs	Describe any wellness programs (as defined in section 2705(j) of the PHS Act) included in this filing.	Yes	Actuarial Memo
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	DISB Actuarial Memo Dataset
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 paid-through 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	Actuarial Memo Exhibit A Part III Act'l Memo
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	Actuarial Memo

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	Actuarial Memo
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	Actuarial Memo
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	Actuarial Memo

Number	Data Element	Requirement Description	Individual and Sm:	all Group
			Has the Data Element Been Included?	Location of the Data Element
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	Actuarial Memo
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	Actuarial Memo

Number	Number Data Element Requirement Description		Individual and Sma	ividual 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.  Provide the assumed administrative costs in the following categories:  Salaries, wages, employment taxes, and other employee benefits  Commissions  Taxes, licenses, and other regulatory fees  Cost containment programs / quality improvement activities  All other administrative expenses  Total	Yes	Actuarial Memo	
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	Actuarial Memo	
34	Other	Any other information needed to support the requested rates or to comply with Actuarial Standard of Practice No. 8.	Yes	Actuarial Memo	
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	Actuarial Memo	

Number Data Element		Requirement Description	Individual and Sma	Individual and Small Group	
			Has the Data Element Been Included?	Location of the Data Element	
36	Part I Preliminary Justification (Grandfathered 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	Unified Rate Review Template (Non- Grandfathered Filings)	Unified Rate Review Template as specified in the proposed Federal Rate Review regulation. Provide this document with all Non-Grandfathered plan filings. Provide in Excel and PDF format.	Yes	Separate Document in SERFF	
37	Part II Preliminary Justification	Written description justifying the rate increase as specified by 45 CFR § 154.215(f). Provide for <i>all</i> individual and small employer group filings (whether or not they are "subject to review" as defined by HHS).	Yes	Separate Document in SERFF	
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	Separate Document in SERFF	
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	Separate Document in SERFF	
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	Exhibit 3	

Number	Data Element	Requirement Description	Individual and Sm	all Gr•up
			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 30 <sup>th</sup> of the current year, whichever is first.	Yes	Supporting Docs in SERFF
42	Additional Requirements for Stand-Alone Dental Plan Filings	Provide the following for stand-alone dental plan filings:  • 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;  • Certification of the level of coverage by a member of the American Academy of Actuaries using generally accepted actuarial principles; and  • 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	ng this rate filing attests that all items contained in the above
checklist have been included in the filing to the best of the con	npany's ability.
Ryan Morgan	Myan Morgan
(Print Name)	(Signature)

Use Integrated Medical and Drug Deductible?			HSA/HRA Options			red Network Op	tion			
Apply Inpatient Copay per Day?		HSA/HRA Emplo	yer Contribution?	? 🗆		Network Plan?				
Apply Skilled Nursing Facility Copay per Day?		Annual Contri	bution Amount:			ier Utilization:				
Use Separate MOOP for Medical and Drug Spending?					2nd 1	ier Utilization:				
Indicate if Plan Meets CSR or Expanded Bronze AV Standard?										
Desired Metal Tier		101 0 010		1						
	Medical	1 Plan Benefit De	Combined	-	Medical	2 Plan Benefit D	esign Combined			
Deductible (\$)		Drug	\$6,350.00	-	iviedicai	Drug	Combined			
(ج) Coinsurance (%, Insurer's Cost Share)			80.00%							
MOOP (\$)			\$7,200.00	1						
MOOP if Separate (\$)			\$7,200.00	_						
moor in separate (4)			•							
Click Here for Important Instructions		Tie	er 1			Tie	er 2		Tier 1	Tier 2
- (0 (0)	Subject to	Subject to	Coinsurance, if	Copay, if	Subject to	Subject to	Coinsurance, if	Copay, if	Copay applie	s only after
Type of Benefit	Deductible?	Coinsurance?	different	separate	Deductible?	Coinsurance?	different	separate	deduct	
Medical	<b>✓</b> All	<b>✓</b> All			✓ All	<b>✓</b> All			All	All
Emergency Room Services	✓	V			✓	V				
All Inpatient Hospital Services (inc. MH/SUD)	V	V			✓	V				
Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and	✓	<b>V</b>			V	V				
X-rays)	1					_				
Specialist Visit	V	V			V	V				
Mental/Behavioral Health and Substance Use Disorder Outpatient	✓	✓			✓	✓				
Services					V	<u>.</u>				
Imaging (CT/PET Scans, MRIs)	V	V				<del></del>				
Speech Therapy	V	V			✓	V				
Occupational and Physical Therapy	✓	V			✓	✓				
Preventive Care/Screening/Immunization			100%	\$0.00			100%	\$0.00		
Laboratory Outpatient and Professional Services	V	~			V V	V				
X-rays and Diagnostic Imaging		✓				V				
Skilled Nursing Facility	V	☑			V	V				
Outpatient Facility Fee (e.g., Ambulatory Surgery Center)	✓	V			☑	✓				
Outpatient Surgery Physician/Surgical Services	☑	✓				V				
Drugs	<b>✓</b> All	✓ All			✓ All	✓ All			All	All
Generics	V	<b>V</b>			V	V				
Preferred Brand Drugs	V	✓			V	V				
Non-Preferred Brand Drugs	V	V			✓	V				
Specialty Drugs (i.e. high-cost)	V	V			✓	V				
Options for Additional Benefit Design Limits:		_	Plan Description	1:						
Set a Maximum on Specialty Rx Coinsurance Payments?			Name:	Bronze HSA						
Specialty Rx Coinsurance Maximum:			Plan HIOS ID:							
Set a Maximum Number of Days for Charging an IP Copay? # Days (1-10):			Issuer HIOS ID: AVC Version:	2024_1e						
Begin Primary Care Cost-Sharing After a Set Number of Visits?		1	7.0 C C C C C C C C C C C C C C C C C C C	2021_20						
#Visits (1-10):	_									
Begin Primary Care Deductible/Coinsurance After a Set Number of		1								
Copays?										
# Copays (1-10):										
Output										
Calculate										
Status/Error Messages:		e Standard (58% t	o 65%), Calculatio	n Successful.						
Actuarial Value:	64.92%									
Metal Tier:	Bronze									
Additional Notes:										
Calculation Time:  Draft 2024 AV Calculator	0.1953 seconds									

User Inputs for Plan Parameters

User Inputs for Plan Parameters								
Use Integrated Medical and Drug Deductible?			HSA/HRA Options		Tie	ered Network Or	otion	
Apply Inpatient Copay per Day?	₹		loyer Contribution?			d Network Plan?		
Apply Skilled Nursing Facility Copay per Day?					15	t Tier Utilization:		
Use Separate MOOP for Medical and Drug Spending?	ā	Annual Contrib	oution Amount:		2n	d Tier Utilization:		
Indicate if Plan Meets CSR or Expanded Bronze AV Standard?					•			
Desired Metal Tier	Gold ▼							
	Tie	r 1 Plan Benefit De	sign		Tier	2 Plan Benefit D	Design	
	Medical	Drug	Combined		Medical	Drug	Combined	
Deductible (\$)	\$500.00	\$0.00						
Coinsurance (%, Insurer's Cost Share)	80.00%	100.00%						
MOOP (\$)	\$5,8	00.00						
MOOP if Separate (\$)								
Click Here for Important Instructions		Tie					er 2	
	Subject to		Coinsurance, if	Copay, if	Subject to	Subject to	Coinsurance, if	
Type of Benefit		Subject to						Copay, if
Type of Benefit	Deductible?	Coinsurance?	different	separate	Deductible?	Coinsurance?	different	separate
Medical				separate	Deductible?	Coinsurance?		
Medical Emergency Room Services	Deductible?	Coinsurance?		\$300.00	Deductible?	Coinsurance?		
Medical	Deductible?	Coinsurance?		separate	Deductible?	Coinsurance?		
Medical Emergency Room Services	Deductible?	Coinsurance?		\$300.00	Deductible?	Coinsurance?		
Medical Emergency Room Services All Inpatient Hospital Services (inc. MH/SUD)	Deductible?	Coinsurance?		\$300.00 \$600.00	Deductible?	Coinsurance?		
Medical Emergency Room Services All Inpatient Hospital Services (inc. MH/SUD) Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and X-rays)	Deductible?	Coinsurance?		\$300.00 \$600.00 \$24.28	Deductible?  V All  V	Coinsurance?		
Medical  Emergency Room Services All Inpatient Hospital Services (inc. MH/SUD)  Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and X-rays)  Specialist Visit	Deductible?	Coinsurance?		\$300.00 \$600.00 \$24.28 \$48.92	Deductible?	Coinsurance?  V All  V  V  V		
Medical Emergency Room Services All Inpatient Hospital Services (inc. MH/SUD) Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and X-rays) Specialist Visit Mental/Behavioral Health and Substance Use Disorder Outpatient Services	Deductible?	Coinsurance?		\$300.00 \$600.00 \$24.28 \$48.92 \$20.83	Deductible?	Coinsurance?   All		
Medical Emergency Room Services All Inpatient Hospital Services (inc. MH/SUD) Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and X-rays) Specialist Visit Mental/Behavioral Health and Substance Use Disorder Outpatient Services Imaging (CT/PET Scans, MRIs)	Deductible?	Coinsurance?		\$300.00 \$600.00 \$24.28 \$48.92 \$20.83 \$250.00 \$30.00	Deductible?  V All  V  V  V  V  V  V  V  V  V	Coinsurance?  All  V  V  V  V  V  V  V  V  V  V  V		
Medical Emergency Room Services All Inpatient Hospital Services (inc. MH/SUD) Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and X-rays) Specialist Visit Mental/Behavioral Health and Substance Use Disorder Outpatient Services Imaging (CT/PET Scans, MRIs)	Deductible?	Coinsurance?		\$300.00 \$600.00 \$24.28 \$48.92 \$20.83 \$250.00	Deductible?	Coinsurance?   All		
Medical Emergency Room Services All Inpatient Hospital Services (inc. MH/SUD) Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and X-rays) Specialist Visit Mental/Behavioral Health and Substance Use Disorder Outpatient Services Imaging (CT/PET Scans, MRIs) Speech Therapy	Deductible?	Coinsurance?		\$300.00 \$600.00 \$24.28 \$48.92 \$20.83 \$250.00 \$30.00	Deductible?	Coinsurance?  All  V  V  V  V  V  V  V  V  V  V  V		
Medical  Emergency Room Services All Inpatient Hospital Services (inc. MH/SUD)  Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and X-rays)  Specialist Visit Mental/Behavioral Health and Substance Use Disorder Outpatient Services Imaging (CT/PET Scans, MRIs)  Speech Therapy  Occupational and Physical Therapy	Deductible?	Coinsurance?	different	\$300.00 \$600.00 \$24.28 \$48.92 \$20.83 \$250.00 \$30.00	Deductible?  All  V  V  V  V  V  V  V  V  V  V  V	Coinsurance?   All  V  V  V  V  V  V  V  V  V  V  V  V	different	separate
Medical  Emergency Room Services All Inpatient Hospital Services (inc. MH/SUD)  Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and X-rays)  Specialist Visit  Mental/Behavioral Health and Substance Use Disorder Outpatient Services Imaging (CT/PET Scans, MRIs)  Speech Therapy  Preventive Care/Screening/Immunization	Deductible?  All  V	Coinsurance?	different	\$300.00 \$600.00 \$24.28 \$48.92 \$20.83 \$250.00 \$30.00 \$0.00	Deductible?	Coinsurance?  V All  V  V  V  V  V  V  V  V	different	separate
Medical  Emergency Room Services All Inpatient Hospital Services (inc. MH/SUD)  Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and X-rays)  Specialist Visit  Mental/Behavioral Health and Substance Use Disorder Outpatient Services Imaging (CT/PET Scans, MRIs)  Speech Therapy  Occupational and Physical Therapy  Preventive Care/Screening/Immunization Laboratory Outpatient and Professional Services	Deductible?  All  U  U  U  U  U  U  U  U  U  U  U  U	Coinsurance?	different	\$300.00 \$600.00 \$24.28 \$48.92 \$20.83 \$250.00 \$30.00 \$30.00 \$28.88	Deductible?	Coinsurance?  V All  V  V  V  V  V  V  V  V  V  V  V  V	different	separate

Generics Preferred Brand Drugs Non-Preferred Brand Drugs Specialty Drugs (i.e. high-cost) Begin Primary Care Cost-Sharing After a Set Number of Visits? # Visits (1-10):

Begin Primary Care Deductible/Coinsurance After a Set Number of Copays? # Copays (1-10):

Outpatient Facility Fee (e.g., Ambulatory Surgery Center)

Outpatient Surgery Physician/Surgical Services

Drugs

\$14.81 \$48.86 \$68.51 \$148.96 Plan Description: 2023 Standard Gold

2024\_1e

\$375.00

\$125.00

Tier 1

Tier 2

Copay applies only after deductible?

Name: Plan HIOS ID: Issuer HIOS ID: AVC Version:

Output

Calculate Status/Error Messages: Actuarial Value: Metal Tier: Calculation Successful. 81.87% Gold

NOTE: Service-specific cost-sharing is applying for service(s) with fac/prof components, overriding outpatient inputs for those service(s).

Additional Notes:

Calculation Time: Draft 2024 AV Calculator

0.2852 seconds

Section   Plan Parameters											
Apply Impotent Claring Facility Coapy or 1992  One Separate MODe for Medical and Drug Speeding Page 1992  For Annual Contribution in Separate Page 1992  For Annual Co	User Inputs for Plan Parameters										
Annual Controllation Amount  Designate MODE for Michigal and Truly page 1  Designation of Mode for Mode for Mode for Michigal State of Mode for	•										
the Separate MOOF for Medical and Drug Spending Top Moderate MOOF for Medical and Drug Spending Top Moderate Moof for Medical Top Moderate Moof for Moderate Moof for Medical Top Moderate Moof for Moderate Moof for Medical Top Moderate Moof for Moderate Moof for Moderate Moof for Mo			HSA/HRA Empl	oyer Contribution?							
Indicate if Plan Meets CSR or Expanded Process As Standard?  Desired Meets (1) Standard?  Colessurance (N. Insurance (N. Insuran			Annual Contril	oution Amount:							
Desired Medial Ter Medical Design   Desired Medial Design   Medical Design   Desired Medial Design   Desired Medial Design   Desired Medical Design   Desired Medial Design   Desired Medical Design   Desired Medical Design   Desired Medical Design   Desired Medical Desired Medical Design   Desired Medical Desi						2nd	Tier Utilization:				
Title   Pain Benefit Debign   Medical   Drug   Combined   Medical   Drug   Combined   Deductible   So. 00   50.00   50.00   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005   100.005	•										
Medical Drug   Combined   Drug   Combined   Drug   Combined   Drug   Combined   Drug   Combined   Drug   Combined   Drug   Dru	Desired Metal Tier				I	_	201 0 61				
Deductable (5)   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.00   50.											
Coinsurance (%, Insuer's Cost Share) MOOF if Separate (5)  Type of Benefit    Description   Subject to   Subj	Deducable (A)			Combined		iviedicai	Drug	Combined			
MOOP # Separate (5)  Type of Benefit  Type of Benefit  Deductible? Colourance, if Subject to Subjec											
Tier 1 Tier 2  Tier 1											
Tier 1 Type of Benefit Deductible? Coinsurance, if Copay, if Subject to Deductible? Coinsurance, if Copay, if Deductible? Coinsurance, if Copay, i		\$2,000	7.00								
Subject to   Subject to Subject to   Subject to Subject to   Subject to   Subject	moor in separate (y)			•				1			
Medical	Click Here for Important Instructions		Tie	r 1			Ti	er 2		Tier 1	Tier 2
Medical   Medi		Subject to	Subject to	Coinsurance, if	Copay, if	Subject to	Subject to	Coinsurance, if	Copay, if	C	
	Type of Benefit	Deductible?	Coinsurance?	different	separate	Deductible?	Coinsurance?	different		Copay applies only	, atter deductible
All Impatient Hospital Services (inc. MH/SUD)	Medical	All	All			✓ All	✓ All			☐ All	All
Signature   Sign	Emergency Room Services				\$150.00	V	V				
Specialist Visit	All Inpatient Hospital Services (inc. MH/SUD)				\$250.00	V	~				
Caputa   C	Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and X-				¢10.44						
Mental/Behavioral Health and Substance Use Disorder Outpatient	rays)				315.44						
	Specialist Visit				\$39.15	V	V				
	Mental/Behavioral Health and Substance Use Disorder Outpatient				\$16.97						
Coccupational and Physical Therapy										···	· · · · · · · · · · · · · · · · · · ·
Docuptational and Physical Therapy	Speech Therapy				\$20.00	~	✓				
100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%   50.00   100%					\$20.00	✓	✓				
Outpatient Facility Fee (e.g., Ambulatory Surgery Center)  Outpatient Surgery Physician/Surgical Services  Drugs  All All All V N V V						_					
Outpatient Facility Fee (e.g., Ambulatory Surgery Center)  Outpatient Surgery Physician/Surgical Services  Drugs  All All All All V N V N I All All N N Generics  Gene				100%				100%	\$0.00		·
Outpatient Facility Fee (e.g., Ambulatory Surgery Center)  Outpatient Surgery Physician/Surgical Services  Drugs  All All All All V N V N I All All N N Generics  Gene		<u> </u>					<u> </u>				H
Outpatient Facility Fee (e.g., Ambulatory Surgery Center)  Outpatient Surgery Physician/Surgical Services  Drugs  All All All All V N V N I All All N N Generics  Gene		<u> </u>				<u> </u>					H
Outpatient Surgery Physician/Surgical Services	Skilled Nursing Facility				\$150.00		<u> </u>				·
Drugs	Outpatient Facility Fee (e.g., Ambulatory Surgery Center)				\$250.00		✓				
Drugs	Outpatient Surgery Physician/Surgical Services				\$0.00	ゼ	✓				
Generics		All	All		, , , , , ,	✓ All	✓ All			All	All
Non-Preferred Brand Drugs Specialty Drugs (i.e. high-cost)  Options for Additional Benefit Design Limits:  Set a Maximum on Specialty Rx Coinsurance Payments? Specialty Rx Coinsurance Maximum: Set a Maximum Number of Days for Charging an IP Copay?  # Days (1-10):  Begin Primary Care Cost-Sharing After a Set Number of Visits?  # Visits (1-10):  Begin Primary Care Deductible/Coinsurance After as Ex Number of Copays? # Copays? # Copays (1-10):  Output  Calculate  Status/Error Messages: Calculation Successful. Actuarial Value: 91.72% Plant HOS ID: Issuer HIOS ID: Issuer H				1	\$5.00	✓	V				
Non-Preferred Brand Drugs Specialty Drugs (i.e. high-cost)  Options for Additional Benefit Design Limits:  Set a Maximum on Specialty Rx Coinsurance Payments? Specialty Rx Coinsurance Maximum: Set a Maximum Number of Days for Charging an IP Copay?  # Days (1-10):  Begin Primary Care Cost-Sharing After a Set Number of Visits?  # Visits (1-10):  Begin Primary Care Deductible/Coinsurance After as Ex Number of Copays? # Copays? # Copays (1-10):  Output  Calculate  Status/Error Messages: Calculation Successful. Actuarial Value: 91.72% Plant HOS ID: Issuer HIOS ID: Issuer H	Preferred Brand Drugs				\$14.75	v	V				
Options for Additional Benefit Design Limits:  Set a Maximum on Specialty Rx Coinsurance Payments? Specialty Rx Coinsurance Maximum: Specialty Rx Coinsurance Maximum: Plan HIOS ID: Begin Primary Care Cost-Sharing After a Set Number of Visits? Begin Primary Care Deductible/Coinsurance After a Set Number of Copays? # Visits (1-10): Copays? # Copays (1-10):  Output Calculate Status/Error Messages: Calculation Successful. Actuarial Value: 91.72% Hetal Tier: Platinum	Non-Preferred Brand Drugs				\$24.54	V					
Set a Maximum on Specialty Rx Coinsurance Payments? Specialty Rx Coinsurance Maximum:  Specialty Rx Coinsurance Maximum:  Specialty Rx Coinsurance Maximum:  # Dasy (1-10):  # Dasy (1-10):  Begin Primary Care Cost-Sharing After a Set Number of Visits?  # Visits (1-10):  Begin Primary Care Deductible/Coinsurance After a Set Number of Copays?  # Copays?  # Copays (1-10):  Cutput  Calculate  Status/Error Messages:  Calculation Successful.  91.72%  Metal Tier:  Platinum	Specialty Drugs (i.e. high-cost)				\$99.32	V	V				
Specialty Rx Coinsurance Maximum:  Set a Maximum Number of Days for Charging an IP Copay?  # Days (1-10):  Begin Primary Care Cost-Sharing After a Set Number of Visits?  # Wists (1-10):  Begin Primary Care Deductible/Coinsurance After a Set Number of Copays?  # Copays (1-10):  Output  Calculate  Status/Error Messages:  Calculation Successful.  Actuarial Value:  91.72%	Options for Additional Benefit Design Limits:			Plan Description:							
Set a Maximum Number of Days for Charging an IP Copay?  # Days (1-10):  Begin Primary Care Cost-Sharing After a Set Number of Visits (1-10):  # Visits (1-10):  Begin Primary Care Deductible/Coinsurance After a Set Number of Copays? # Copays (1-10):  Output  Calculate  Status/Error Messages:  Calculation Successful. Actuarial Value:  91.72%  Metal Tier:  Platinum	Set a Maximum on Specialty Rx Coinsurance Payments?			Name:							
# Days (1-10): 5  Begin Primary Care Cost-Sharing After a Set Number of Visits? # Wisits (1-10):  Begin Primary Care Deductible/Coinsurance After a Set Number of Copays? Copays? # Copays (1-10):  Output  Calculate  Status/Error Messages: Calculation Successful. Actuarial Value: 91.72% Heat Tier: Platinum											
Begin Primary Care Cost-Sharing After a Set Number of Visits?  # Visits (1-10):  Begin Primary Care Deductible/Coinsurance After a Set Number of Copays? # Copays (1-10):  Output  Calculate  Status/Error Messages: Calculation Successful.  Actuarial Value: 91.72% Metal Tier: Platinum											
# Visits (1-10):  Begin Primary Care Deductible/Coinsurance After a Set Number of Copays? # Copays (1-10):  Output  Calculate  Status/Error Messages: Calculation Successful. Actuarial Value: 91.72% Metal Tier: Platinum				AVC Version:	2024_1e						
Begin Primary Care Deductible/Coinsurance After a Set Number of Copays?  ## Copays (1-10):  Output  Calculate  Status/Error Messages: Actuarial Value: 91.72% Hetal Tier: Platinum		' LI									
Copays? #Copays (1-10):  Output  Status/Error Messages: Calculation Successful. Actuarial Value: 91.72%  Metal Tier: Platinum											
#Copays (1-10):  Output  Calculate  Status/Error Messages: Actuarial Value: 91.72% Metal Tier: Platinum											
Calculate Calculate Calculate Calculatin Successful. Actuarial Value: 91.72% Metal Tier: Platinum											
Status/Error Messages: Calculation Successful.  Actuarial Value: 91.72%  Metal Tier: Platinum											
Actuarial Value:         91.72%           Metal Tier:         Platinum	Calculate										
Metal Tier: Platinum	Status/Error Messages:	Calculation Successi	ful.								
	Actuarial Value:	91.72%									
NOTE: Service-specific cost-sharing is applying for service(s) with fac/prof components, overriding outpatient inputs for those service(s).	Metal Tier:										
		NOTE: Service-speci	fic cost-sharing is	applying for servic	e(s) with fac/prof	components, ov	erriding outpati	ent inputs for thos	e service(s).		

0.0508 seconds

Additional Notes:

Calculation Time:

Draft 2024 AV Calculator

User Inputs for Plan Parameters					_					
Use Integrated Medical and Drug Deductible? Apply Inpatient Copay per Day?			HSA/HRA Options loyer Contribution			red Network Op d Network Plan?	otion			
Apply Skilled Nursing Facility Copay per Day?		пзаупка епір	loyer Contribution	<u> </u>		: Tier Utilization:				
Use Separate MOOP for Medical and Drug Spending?		Annual Contri	bution Amount:			Tier Utilization:				
Indicate if Plan Meets CSR or Expanded Bronze AV Standard?										
Desired Metal Tier										
	Tier 1	Plan Benefit De	sign		Tier	2 Plan Benefit D	esign			
	Medical	Drug	Combined		Medical	Drug	Combined			
Deductible (\$)	\$4,850.00	\$344.76								
Coinsurance (%, Insurer's Cost Share)	80.00%	100.00%								
MOOP (\$)	\$8,850	.00								
MOOP if Separate (\$)			ı							
Click Here for Important Instructions		Tie	er 1			Ti	er 2		Tier 1	Tier 2
	Subject to	Subject to	Coinsurance, if	Copay, if	Subject to	Subject to	Coinsurance, if	Copay, if		
Type of Benefit	Deductible?	Coinsurance?	different	separate	Deductible?	Coinsurance?	different	separate	Copay applies on	ly after deductible?
Medical	☐ All	All			✓ All	✓ All			☐ All	☐ All
Emergency Room Services	<b>V</b>			\$400.00	KK	V			V	
All Inpatient Hospital Services (inc. MH/SUD)	☑	V			V	V				
Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and X-	П			\$38.81		V				
rays) Specialist Visit				\$78.23	✓	✓			П	
Mental/Behavioral Health and Substance Use Disorder Outpatient		Ш			~	<u>~</u>				
Services				\$28.14	✓	✓				
Imaging (CT/PET Scans, MRIs)	П			\$400.00	፟	V			П	
Speech Therapy				\$65.00						
				\$65.00	V	V				П
Occupational and Physical Therapy						_				_
Preventive Care/Screening/Immunization			100%	\$0.00			100%	\$0.00		
Laboratory Outpatient and Professional Services				\$57.76	V V	\ \				
X-rays and Diagnostic Imaging	<u> </u>			\$80.00	V V	<b>∨</b>				
Skilled Nursing Facility	·····	······								
Outpatient Facility Fee (e.g., Ambulatory Surgery Center)	✓	✓			✓	✓				
Outpatient Surgery Physician/Surgical Services	<b>☑</b>	Ø.			v	v				
Drugs	☐ All	☐ All			✓ All	✓ All			All	All
Generics				\$19.72	V	V				
Preferred Brand Drugs	V			\$48.86	V	V			V	
Non-Preferred Brand Drugs	<u> </u>			\$68.51	N N	V			<u>v</u>	
Specialty Drugs (i.e. high-cost)	V			\$148.96	<b>✓</b>	✓			V	
Options for Additional Benefit Design Limits:			Plan Description:							
Set a Maximum on Specialty Rx Coinsurance Payments?  Specialty Rx Coinsurance Maximum:			Name: Plan HIOS ID:							
Set a Maximum Number of Days for Charging an IP Copay?	П		Issuer HIOS ID:							
# Days (1-10):	_		AVC Version:	2024_1e						
Begin Primary Care Cost-Sharing After a Set Number of Visits?										
# Visits (1-10):										
Begin Primary Care Deductible/Coinsurance After a Set Number of										
Copays?										
# Copays (1-10):										
Output Calculate										
	Calculation Successf	ul.								
	70.46%									
Metal Tier:	Silver									
Additional Notes:										
	0.1758 seconds									
Draft 2024 AV Calculator										

User Inputs for Plan Parameters										
Use Integrated Medical and Drug Deductible?			HSA/HRA Options	5	Tie	ered Network Or	otion			
Apply Inpatient Copay per Day?	· 🗆	HSA/HRA Em	ployer Contribution	?	Tiere	ed Network Plan?				
Apply Skilled Nursing Facility Copay per Day?		Annual Canta			1:	st Tier Utilization:	: -			
Use Separate MOOP for Medical and Drug Spending?		Annual Contri	ibution Amount:		2n	d Tier Utilization:				
Indicate if Plan Meets CSR or Expanded Bronze AV Standard?					•					
Desired Metal Tier				_						
	Tie	er 1 Plan Benefit De	esign		Tie	r 2 Plan Benefit D	Design			
	Medical	Drug	Combined		Medical	Drug	Combined			
Deductible (\$	\$7,500.00	\$849.88								
Coinsurance (%, Insurer's Cost Share)		100.00%								
MOOP (\$		50.00								
MOOP if Separate (\$)										
Click Here for Important Instructions			er 1				er 2		Tier 1	Tier 2
Type of Benefit	Subject to	Subject to	Coinsurance, if		Subject to	Subject to	Coinsurance, if	Copay, if	Copay applies only	after deductible
	Deductible?	Coinsurance?	different	separate	Deductible?	Coinsurance?	different	separate		
Medical	All	All			✓ All	✓ All			All	All
Emergency Room Services	~	~			~	✓				
All Inpatient Hospital Services (inc. MH/SUD)	✓	✓			<b>V</b>	⊻				
Primary Care Visit to Treat an Injury or Illness (exc. Preventive, and X-rays)				\$43.66	✓	<u>~</u>				
Specialist Visit		П		\$102.66	7	✓			П	
Mental/Behavioral Health and Substance Use Disorder Outpatient Services	1.1	1.1		\$31.53	l	VI				
Imaging (CT/PET Scans, MRIs)	~			\$500.00	Ž	Ÿ			~	
Speech Therapy	~			\$50.00	✓	✓			~	
	2			¢50.00	V	V			<b>V</b>	
Occupational and Physical Therapy	_			\$50.00		₩.				
Preventive Care/Screening/Immunization			100%	\$0.00			100%	\$0.00		
Laboratory Outpatient and Professional Services				\$72.20	✓	<b>v</b>				
X-rays and Diagnostic Imaging	✓			\$80.00	<b>Y</b>	<b>Y</b>			•	
Skilled Nursing Facility	<b>V</b>	<b>V</b>			✓	<b>v</b>				
Outpatient Facility Fee (e.g., Ambulatory Surgery Center)	<b>9</b>	<b>y</b>			V	V				
Outpatient Surgery Physician/Surgical Services	<b>V</b>	~			V	✓				П
Drugs	All	□ All			▼ All	▼ All			□ All	□ All
Generics		- i		\$24.63	V	~			ă	
Preferred Brand Drugs	<u> </u>	<u> </u>		\$73.23		✓			7	
Non-Preferred Brand Drugs	<b>V</b>			\$97.82	$\overline{\mathbf{z}}$	~			<u> </u>	ā
Specialty Drugs (i.e. high-cost)	7			\$148.96	7	7			7	ā
Options for Additional Benefit Design Limits:			Plan Description:							
Set a Maximum on Specialty Rx Coinsurance Payments?	· 🗆	1	Name:	2023 Bronze Cop	oay					
Specialty Rx Coinsurance Maximum:			Plan HIOS ID:							
Set a Maximum Number of Days for Charging an IP Copay?		1	Issuer HIOS ID:							
# Days (1-10):			AVC Version:	2024_1e						
Begin Primary Care Cost-Sharing After a Set Number of Visits? # Visits (1-10)										
Begin Primary Care Deductible/Coinsurance After a Set Number of Copays?		1								
#Copays (1-10)	•	J								
Calculate										
Status/Error Messages:	Expanded Bronze	Standard (58% to 6	5%), Calculation Su	rcessful						
Actuarial Value:	64.95%	J	o,o,, calculation sui	cccssiui.						
Metal Tier:	Bronze									

0.1953 seconds

Additional Notes:

Calculation Time:

Draft 2024 AV Calculator

# Unique Plan Design—Supporting Documentation and Justification

Fill in the following information:

**Health Insurance Oversight System (HIOS) Issuer ID:** 

41842

HIOS Product IDs: 41842DC001, 41842DC004, 41842DC007, 41842DC008

## **Applicable HIOS Plan IDs (Standard Component):**

HIOS Plans IDs are listed in Exhibit 2 and Exhibit 4.

Reasons the plan design is unique, that is, the benefits incompatible with the parameters of the Actuarial Value Calculator (AVC) and their materiality:

Prescription drug benefits based on drug categorization for tiers 1-4 and Hospital/Freestanding plan designs are not compatible with calculator.

#### Acceptable alternate method used per 156.135(b)(2) or 156.135(b)(3):

The alternate method described in 45 CFR 156.135(b)(2) was used for the AV calculations. Relying on Oliver Wyman for AVs of Standard Plans.

Confirmation that only in-network cost sharing, including multitier networks, was considered:

Only in-network cost sharing was considered for the alternate method as mentioned above.

## Description of the standardized plan population data used:

Claims and enrollment data enclosed in the AV Calculator Continuance tables were used for each metal level.

If the method described in 156.135(b)(2) was used, a description of how the benefits were modified to fit the parameters of the AVC:

Please see the Part III memo for information regarding the unique benefits that were modified.

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

Not applicable. Only the method described in 45 CFR 156.135(b)(2) was used for the AV calculations.

#### **Certification Language:**

The development of the actuarial value is based on one of the acceptable alternative methods outlined in 156.135(b)(2) or 156.135(b)(3) for benefits that deviate substantially from the parameters of the AVC and have a material impact on the actuarial value.

The analysis was

- (i) conducted by a member of the American Academy of Actuaries and
- (ii) performed in accordance with generally accepted actuarial principles and methods.

Actuary Signature: Ryan Morgan	Digitally signed by Ryan Morgan Date: 2023.05.01 11:42:49 -05'00'
Actuary Printed Name: Ryan Morgan	
Date: 05/01/2023	

If you don't have enough space here to list your justifications, print out another form to augment them as needed.



# Actuarial Memorandum UnitedHealthcare Insurance Company, NAIC #79413 DC Small Group Rate Filing

May 1, 2023

This rate filing presents proposed premium rates effective January 1, 2024 through December 31, 2024 for medical and Rx benefit plans to be sold by the UnitedHealthcare Insurance Company to small group employers.

The filing has been prepared as required by the "Reasonable Health Insurance Ratemaking and Health Care Reform Act of 2010", as well as current ACA rules and more recent guidance from the DC Department of Insurance. This rate filing should not be used for any other purposes. Within that context, there are no limitations or constraints on the use or applicability of the rating items discussed herein. The intended user of this filing is the DC Department of Insurance.

The benefit plans and rates are for non-grandfathered employers. The proposed rates and rate factors are in Exhibit 1, which also displays the metal level and actuarial value of each benefit plan. Benefit plan descriptions are in Exhibit 2. Exhibit 4 identifies new benefit plans being added in 2024, and 2023 benefit plans with plan changes (uniform modification).

Responding to the items in the DC Rate Filing Checklist:

1. Purpose of Filing. UnitedHealthcare is filing for the first time rates for 2024. The proposed 1st quarter 2024 rates are on average 5.7% higher than our 1st quarter 2023 rates. The rate changes vary by benefit plan as we have realigned our price relationships between plans. In addition, we are filing for quarterly rate increases as follows: 2Q24 +1.9%, 3Q24 +1.9%, 4Q24 +1.9%. These quarterly rate increases are based on our trend rate of 7.9%. The average year-over-year renewal rate change is +6.0%, the minimum change on this entity is +3.8%, and the maximum change on this entity is +10.1%. Please see Exhibit 3 for detail on the rate changes.

#### 2) Form Numbers. The form numbers are as follows:

COC24.SHOP.I.2018.SG.DC POL24.SHOP.I.2018.SG.DC SBN24.CHP.I.2018.SG.DC.DGQJ SBN24.CHP.I.2018.SG.DC.DGON SBN24.CHP.I.2018.SG.DC.DIAK SBN24.CHP.I.2018.SG.DC.DGQ7 SBN24.CHP.I.2018.SG.DC.DGRB SBN24.CHP.I.2018.SG.DC.DGRW SBN24.CHP.I.2018.SG.DC.DGQL SBN24.CHP.I.2018.SG.DC.DGOO SBN24.CHP.I.2018.SG.DC.DIAL SBN24.CHP.I.2018.SG.DC.DGOZ SBN24.CHP.I.2018.SG.DC.DGQ2 SBN24.CHP.I.2018.SG.DC.DGO3 SBN24.CHP.I.2018.SG.DC.DGQ5 SBN24.CHP.I.2018.SG.DC.DGRA SBN24.CHP.I.2018.SG.DC.DGRC SBN24.CHP.I.2018.SG.DC.DGRF SBN24.CHP.I.2018.SG.DC.DGRH

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SBN24.CHP.I.2018.SG.DC.DGRP
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- SBN24.CHP.I.2018.SG.DC.DGRU
- SBN24.CHP.I.2018.SG.DC.DGQR
- SBN24.CHP.I.2018.SG.DC.DIAM
- SBN24.CHP.I.2018.SG.DC.DG-RJ
- SBN24.CHP.I.2018.SG.DC.DG-RL
- SBN24.CHP.I.2018.SG.DC.DG-RN
- SBN24.CHP.I.2018.SG.DC.DG-RQ
- SBN24.CHP.I.2018.SG.DC.DG-RS
- SBN24.CHP.I.2018.SG.DC.DG-RT
- SBN24.CHP.I.2018.SG.DC.DGOF
- SBN24.CHP.I.2018.SG.DC.DGQS
- SBN24.CHC.I.2018.SG.DC.DGQO
- SBN24.CHC.I.2018.SG.DC. DGQ6
- SBN24.CHC.I.2018.SG.DC. DGQ8
- SBN24.CHC.I.2018.SG.DC.DGQK
- SBN24.CHC.I.2018.SG.DC.DGQM
- SBN24.CHC.I.2018.SG.DC.DGQP
- SBN24.CHC.I.2018.SG.DC.DGO4
- SBN24.CHC.I.2018.SG.DC.DGQ9
- SBN24.CHC.I.2018.SG.DC.DGRE
- SBN24.CHC.I.2018.SG.DC.DGRG
- SBN24.CHC.I.2018.SG.DC.DGRO
- SBN24.CHC.I.2018.SG.DC.DGQU
- SBN24.CHC.I.2018.SG.DC.DG-RI
- SBN24.CHC.I.2018.SG.DC.DG-RM
- SBN24.CHC.I.2018.SG.DC.DG-RR
- SBN24.CHC.I.2018.SG.DC.DGQH
- RID24.PDS.NET.I.2018.SG.DC
- RID24.PDS.NET-OON.I.2018.SG.DC
- RID24.PDS.NET-OON.I.2018.SG.DC.DIAK
- RID24.PDS.NET-OON.I.2018.SG.DC.DIAL
- RID24.PDS.NET-OON.I.2018.SG.DC.DIAM RID24.PDS.NET-OON.I.2018.SG.DC.DGOF
- RID24.PDS.NET-OON.I.2018.SG.DC.DGQS
- RID24.PVCS.NET.I.2018.SG.DC
- RID24.PVCS.NET-OON.I.2018.SG.DC
- RID24.RX.NET.I.2018.SG.DC
- RID24.RX.NET-OON.I.2018.SG.DC
- SBN24.RX.NET.I.2018.SG.DC.55050%150
- SBN24.RX.NET.I.2018.SG.DC.155050%150
- SBN24.RX.NET.I.2018.SG.DC.55080125
- SBN24.RX.NET.I.2018.SG.DC.104075125
- SBN24.RX.NET.I.2018.SG.DC.154075125
- SBN24.RX.NET.I.2018.SG.DC.204575125
- SBN24.RX.NET.I.2018.SG.DC.NONE
- SBN24.RX.NET-OON.I.2018.SG.DC.1030%
- SBN24.RX.NET-OON.I.2018.SG.DC.54075125
- SBN24.RX.NET-OON.I.2018.SG.DC.55080125
- SBN24.RX.NET-OON.I.2018.SG.DC.104075125
- SBN24.RX.NET-OON.I.2018.SG.DC.154075125

SBN24.RX.NET-OON.I.2018.SG.DC.155080125

SBN24.RX.NET-OON.I.2018.SG.DC.204575125

SBN24.RX.NET-OON.I.2018.SG.DC.K61

SBN24.RX.NET-OON.I.2018.SG.DC.N43

SBN24.RX.NET-OON.I.2018.SG.DC.N44

SBN24.RX.NET-OON.I.2018.SG.DC.N45

SBN24.RX.NET-OON.I.2018.SG.DC.N46

RID24.SELFCARE.I.2018.SG.DC

RID24.One Pass.I.2018.SG.DC

- 3) HIOS Product ID. The HIOS product ID's for the respective products are as follows: CH+/Ins (POS): 41842DC008, CH/Ins (EPO): 41842DC004 and 41842DC007
- 4) Effective Date. 1/1/2024.
- 5) Market. The benefit plans will be offered in the small employer group market.
- 6) Status of Forms. The forms are open to new sales and are for non-grandfathered groups.
- <u>7) Benefits/Metal Levels</u>. The benefits by plan are summarized in Exhibit 2. The metal level for each benefit plan is indicated in Exhibit 1.
- <u>7.1) AV Value</u>. The actuarial value for each plan design using the HHS provided AV calculator is indicated in Exhibit 1.

#### 8) Average Rate Increase Requested

#### Incremental:

1Q24/4Q23: +0.3%

2Q24/1Q24: +1.9%

3O24/2O24: +1.9%

4Q24/3Q24: +1.9%

#### Year-over-year renewal:

1Q24/1Q23: +5.7%

2O24/2O23: +5.8%

3Q24/3Q23: +6.0%

4Q24/4Q23: +6.2%

Average year-over-year renewal: +6.0%

#### 9) Maximum Rate Increase Requested

#### Incremental:

1Q24/4Q23: +4.0%

2Q24/1Q24: +1.9%

3Q24/2Q24: +1.9%

4O24/3O24: +1.9%

Year-over-year renewal: +10.1%

## 10) Minimum Rate Increase Requested

#### Incremental:

1Q24/4Q23: -1.6%

2Q24/1Q24: +1.9% 3Q24/2Q24: +1.9% 4Q24/3Q24: +1.9%

Year-over-year renewal: +3.7%

- 11) Absolute Maximum Premium Increase. The absolute maximum year-over-year renewal increase, including one year of aging (20 to 21, which is an 11.1% increase in age factor), is +22.3%.
- 12) Average Renewal Rate Increase for a Year. Per our URRT, the average renewal rate changes by HIOS product ID is: 41842DC001 +4.1%, 41842DC004 +4.1%, 41842DC007 +6.2% 41842DC008 +6.1%.

#### 13) Rate Change History.

10/1/23: +1.7% 7/1/23: +1.8% 4/1/23: +1.8% 1/1/23: +2.4% 10/1/22: +1.7% 7/1/22: +1.8% 4/1/22: +1.8% 1/1/22: +3.7%10/1/21: +2.2% 7/1/21: +2.2% 4/1/21: +2.2% 1/1/21: -1.2% 10/1/20: +2.2% 7/1/20: +2.2% 4/1/20: +2.2% 1/1/20: -1.2%

10/1/20: +1.9% 7/1/20: +2.0% 4/1/20: +1.9% 1/1/20: +1.4%

14) Exposure. As of February, 2023:

Policies: 1,995 Certificates: 6,570 Covered Lives: 10,812

- 15) Member Months. See Exhibit A.
- 16) Past Experience. See Exhibit A.
- 17) Index Rate. See URRT.

#### 17.1) Rate Development.

The base experience is shown in Exhibit A.

We are proposing to set our 1<sup>st</sup> quarter 2024 on average 0.3% higher than our current 4<sup>th</sup> quarter 2023 rates, and then apply quarterly rate increases in each of the last three quarters of 2023. The quarterly rate increases are equivalent to an annual 7.0% trend. These rates will yield an 81.1% underwriting ratio (claims divided by premium).

The 2024 base rate is calculated as follows: (2023 Base Rate) x (2023 Trend) x (1/1/2024 Rate Change) x (Revenue Neutral Base Rate Adjustment) 2024 Base Rate = (885.75) x (1.073) x (0.984) x (0.983) = 867.41

- 18) Credibility Assumption. We have set our rate levels based on the combined DC experience on our small group licenses, which we believe is credible.
- 19) Trend Assumption. See Exhibit T. At UnitedHealthcare, we have a team of actuaries whose responsibilities include developing forward-looking trend projections and monitoring historical performance in relation to trend. We rely on this team to provide guidance on trends appropriate for DC rate development.
- 20) Cost Sharing Changes and 21) Benefit Changes. Changes to member cost sharing were required for certain benefit plans. Use of the new federal Actuarial Value (AV) Calculator led to some benefit plans falling outside the allowed +2% /-2% AV metal ranges. Benefit plan changes were made to move these plans back into the allowed AV ranges. The benefit changes for these plans, and the estimated cost value of the changes, is shown in Exhibit 4.
- 22) Plan Relativities. We refined the medical plan price relativities to reflect the most recent methodology update using the most recent available models. The medical plan price relativities were developed using our pricing model ARC (Actuarial Relativity Calculator). The ARC model is based on UnitedHealthcare nationwide experience data, containing utilization frequencies and unit costs by service category, and claim distributions and adjustment factors for a large number of plan design variables. Benefit design parameters such as deductibles, coinsurance, copays, out-of-pocket maximums, etc. were input for each plan into ARC. The expected net-to-allowed relativity for each plan is then used to develop the plan relativities for each benefit plan. All benefit plans are priced consistently with each other, with the rates different only by the estimated value of the benefit differences. The prescription drug plan relativities were similarly developed using our ARC Pricing model: this model, based on nationwide UnitedHealthcare prescription drug experience, values the cost differences of Rx copays by tier, and other plan cost sharing features such as Rx deductibles and coinsurance.

Using the new ARC model (used for both medical and Rx price relativities), we set the new 2024Q1 base rates to be 1.7% lower than the 2023 base rate. The calculation of the -1.7% is demonstrated in Exhibit 6.

- <u>23)</u> Rating Factors. We are resetting our 1<sup>st</sup> quarter 2024 Effective Date Adjustment (EDA) factors to 1.000. Rating factors are displayed on Exhibit 1. Exhibit 3 details the changes to rating factors.
- 23.1) Wellness Programs. All of our DC SG ACA plans include our UHC Rewards wellness program.
- <u>24) Distribution of Rate Increases</u>. The distribution of rate increases is shown in the DISB Actuarial Memorandum Dataset.

- 25) Claim Reserve Needs. The incurred period used for the base period is 1/1/22 through 12/31/22, using claims paid through 2/28/2023. The claim reserve amounts are included in Exhibit A. A description of our reserving methodology is included in the Part III Actuarial Memorandum.
- 26) Administrative Costs of Programs that Improve Health Care Quality. The Improving Health Care Quality costs in total for our small group licenses is 0.6% of premium.
- 27) Taxes and Licensing or Regulatory Fees. The amount of taxes, licenses, and fees subtracted from premium in the denominator of the medical loss ratio calculation is 4.0%.
- 28) Medical Loss Ratio (MLR). The anticipated Federal MLR is 85.0%, which is greater than the 80% minimum. The estimated Federal MLR components, adjustments, and formula are as follows:
  - 81.1% Underwriting loss ratio
  - 0.6% QI/HIT Medical costs added
  - 4.0% Taxes, regulatory fees and assessments

MLR formula:  $[(UW LR) \times (1 + QIT)]/(1 - taxes)$ 

- 29) Risk Adjustment. Based on estimates from a consulting firm, across all 3 legal entities, we are projected to be a 2.6% payer in 2022. However, based on changes in the risk adjustment formula, we are expected to be less of a risk adjustment payer (by 0.3%) in 2024. Therefore, when final risk adjustment results come out in the summer, we will update this projection with the actual 2022 number and adjust it to be 0.3% more favorable and use that as our final risk adjustment projection.
- 30) Past and Prospective Loss Experience Within and Outside the State. Only loss experience on DC plans, written on DC employers, was used in the development of the rates. This experience does include medical services provided outside DC, to employees of DC employers who live outside DC, or to DC residents who obtain medical services outside DC. We have set our rate levels based on the total overall experience of our small group licenses in DC, which we believe is credible, thus not requiring use of loss experience outside the state.
- 31) A Reasonable Margin for Reserve Needs. The profit margin originally assumed in the development of our proposed rates was 2.3% of premium (after taxes). This assumption is close to our historically approved margin in prior years and similar to the margin that has historically been approved for other insurance carriers in the DC small group market.
- <u>32) Past and Prospective Expenses</u>. The expenses assumed in the development of the proposed rates are as follows.

% of Premium	Expense Category
3.8%	Salaries, wages, employment taxes, and other employee benefits
2.8%	Commissions
4.0%	Taxes, licenses, and other regulatory fees
1.9%	Cost containment programs / quality improvement activities
4.1%	All other administrative expenses
17.6%	Total

33) Any Other Relevant Factors Within and Outside the State. None.

#### 35) Actuarial Certification.

I, Ryan Morgan, a Director at UnitedHealthcare, am an FSA and MAAA. I satisfy the 2022 continuing professional development requirements of the Academy and therefore am qualified to issue this 2023 statement of actuarial opinion. I have reviewed applicable ASOPs during the preparation of this rate filing. There are no conflicts of interest with regards to my production of this rate filing.

I certify 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 DC and all applicable Actuarial Standards of Practice, including ASOP No. 8, and the rates are not unfairly discriminatory.

Ryan Morgan, FSA, MAAA

Ryan Morgan

Date: 5/1/2023

- 36) Part I Preliminary Justification for Grandfathered Plan Filings. Not applicable.
- <u>36.1) Unified Rate Review Template</u>. This is provided via SERFF.
- 37) Part II Preliminary Justification. This is provided via SERFF.
- 38) DISB Actuarial Memorandum Dataset. This is provided via SERFF.
- 39) DC Plain Language Summary. This is provided via SERFF.
- 40) Summary of Components for Requested Rate Change: Please see Exhibit 3.
- 41) CCIIO Risk Adjustment Transfer Elements Extract (RATE 'E'): This is not available at the time of filing, but will be added via SERFF.
- 42) Additional Requirements for Stand-Alone Dental Plans. Not applicable.

## **List of exhibits included in rate filing:**

Exhibit 1: Rates and rate factors.

Exhibit 2: Benefit plan descriptions.

Exhibit 3: Rate factor changes.

Exhibit 4: Plan changes.

Exhibit 5: Rating example.

Exhibit 6: Benefit resloping adjustment.

Exhibit 7: Actuarial value and cost share.

Exhibit A: Member months, earned premium & incurred claim experience.

Exhibit B: Estimated Federal MLR.

Exhibit T: Trend assumptions and development.

Please keep these rates confidential to the extent allowed by DC law. If you have questions, or need any further information, please do not hesitate to contact me.

Sincerely,

Ryan Morgan, FSA, MAAA Director, Actuarial Services

Ryan Morgan

UnitedHealthcare