

**STATE OF RHODE ISLAND AND  
PROVIDENCE PLANTATIONS**

**OFFICE OF THE HEALTH INSURANCE COMMISSIONER**

*In Re: Blue Cross Blue Shield of Rhode Island  
Rates Filed for 2021 Individual Market Plans*

**SERFF ID: BCBS-132404728**

**REPORT OF Beth Fritchen, FSA, MAAA and Gabe Rivera, FSA, MAAA  
SUBMITTED ON BEHALF OF THE ATTORNEY GENERAL**

**August 10, 2020**

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**EXHIBITS**

AG-1	Reduce Utilization Trends
AG-2	Reduce Contribution to Reserves
AG-3	Reduce [REDACTED] Projections
AG-4	All Adjustments – Summary of Changes

## **I. NATURE AND PURPOSE OF REPORT**

The Attorney General is vested with the authority and enforcement of the laws within the State of Rhode Island, including, but not limited to, representing, protecting and advocating on behalf of consumers at public rate hearings. R.I. Gen. Laws §§ 27-36-1, 27-19-6 and 27-20-6. An insurer in the individual market cannot change its rates for its Class DIR products without approval of Rhode Island's Health Insurance Commissioner.

A public hearing must be held for a requested rate increase in the individual market of 10% or higher by an insurer covering 10,000 or more individual lives ("Rate Hearing"). R.I. Gen. Laws §§ 27-19-6(f) and 27-20-6(f).

In the event a Rate Hearing is not triggered, Rhode Island law allows the Attorney General to hire actuaries to review the Rate Filings and conduct discovery. R.I. Gen. Laws §§ 27-19-6(j)(2)-(k), 27-20-6(j)(2)-(k), and 27-36-2(a). Blue Cross Blue Shield of Rhode Island ("Blue Cross") filed with the Office of the Health Insurance Commissioner ("OHIC") on June 18, 2020 and then refiled on July 28, 2020 seeking to change its rates effective on January 1, 2021 for plans to be offered in the individual market (the "Filing").

Blue Cross has submitted one filing with a requested average rate increase of 5.7%. In addition to the weighted average rate change, the rate for a theoretical plan that provides 100% coverage for all Essential Health Benefits (EHB) is also provided in order to easily compare across carriers and years. The weighted average rate change for this theoretical plan is a 0.9% decrease. The public hearing requirement for Blue Cross is not triggered this year. The purpose of this Report is to provide the results of our review and analysis of Blue Cross's Filings and to provide alternative recommendations and calculations to Blue Cross's requested rates on behalf of the Attorney General.

## **II. PERSONAL QUALIFICATIONS**

**Beth Fritchen, FSA, MAAA**, is a Partner with Oliver Wyman Actuarial Consulting, Inc., and serves as Managing Actuary. Beth has over 30 years of experience in the health insurance market which includes pricing of products for the individual, small group and large group markets, as well as the pricing of drug, vision, dental and specialty HMO products. Beth has extensive experience reviewing rate filings and testifying before various legislative venues on behalf of several states.

**Gabe Rivera, FSA, MAAA**, is a Senior Consulting Actuary with Oliver Wyman Actuarial Consulting, Inc. Gabe has over 9 years of experience in the health insurance market which includes pricing of products for the individual, small group and large group markets. Gabe also has extensive experience reviewing rate filings for various states.

### **III. BACKGROUND**

Pursuant to Rhode Island General Laws § 27-19.2-10(2), Blue Cross is required to offer coverage to citizens of Rhode Island in the individual market. Blue Cross' last rate filing in the individual market for its Direct Pay products had an initial request of -0.1%. The final approved rate change of -1.5% was finalized in August of 2019, with rates becoming effective January 1, 2020.

In March 2010, the 111<sup>th</sup> Congress passed health reform legislation, the Patient Protection and Affordable Care Act ("ACA"; P.L. 111-148), as amended by the Health Care and Education Reconciliation Act of 2010 (HCERA; P.L. 111- 152) and other laws. The ACA expanded federal private health insurance market requirements and required the creation of health insurance exchanges effective January 1, 2014 to provide individuals with access to insurance. Blue Cross is required to comply with all the ACA requirements for plans that are sold both through the Exchange (HealthSource Rhode Island – or "HSRI") and outside the Exchange. Blue Cross's product offerings must comply with the ACA's rules and premium rates which must be the same for both Exchange and non-Exchange products. The ACA's restrictions on rating do not allow rates to vary by gender or by health status and substantially limit variation by age and family status. As required by OHIC, the current Filing relies on experience from 2019, the most recently completed calendar year.

As stated in page 2 of Blue Cross' filed Actuarial Memorandum, "the proposed weighted average rate change for the Individual market is 5.7%".

**IV. MATERIALS REVIEWED**

In performing our analysis and preparing our report, we reviewed the filing, as well as the materials submitted by Blue Cross in response to data requests submitted by the Attorney General, OHIC and Oliver Wyman. We also reviewed publicly available information relevant to this filing. Revisions and supplementation to this Report may occur as further information becomes available, is otherwise discovered or developed, or as any additional matters or issues may be raised in connection with the filing.

V. **FINDINGS**

A. **There are assumptions in Blue Cross's Filings that, if adjusted to our recommendations, could reduce rates by 4.2%.**

The Blue Cross Filing contains assumptions in calculating its requested rates that could be reasonably adjusted to reflect less conservative assumptions. These assumption changes could reduce rates by 4.2%. The assumptions that could result in lower rates are: changes in the projected inpatient utilization trends, contributions to reserves and new pharmacy drug cost and utilization projections. Each of these assumptions are discussed in turn below.

We have prepared a number of exhibits for this Report that analyze the impact on Blue Cross' requested rate changes, including Exhibits AG-1 through 4. For each of the exhibits, we have relied upon the data, formats and formulas that Blue Cross either used in its Filing or included in its responses to data requests. For ease of reference, in each of these Exhibits, we have highlighted the factor(s) that we have changed. Exhibits 1 through 3 focus on each of the three issues in isolation, while Exhibit AG-4 includes the impact of all issues raised herein combined.

We have measured the value of each of the recommended changes by valuing the impact on the "EHB Rate" which is identified in Line 95 of the Part II Rate Development tab of the Filing template. For each age and each plan option offered in 2021, Blue Cross' corresponding premium rate will be a multiple of the approved EHB Rate. Therefore, any percentage change in the EHB Rate will be reflected as an identical percentage change in the rate Blue Cross will be permitted to charge a member. For example, a 1% reduction in the EHB Rate will reduce each and every member's premium in 2021 by 1% from Blue Cross' proposed rates.

## **1) Utilization Trends.**

We have reviewed the general information provided by Blue Cross related to utilization trends. Blue Cross provided utilization trend graphs in response to OHIC questions that were asked on June 25<sup>th</sup>, 2020. The graphs provided were developed separately by service category (inpatient, outpatient, professional, prescription drug) and encompassed 24 months of data, from January 2018 through December 2019. Included in the graphs were estimates of the best-fit regression line with the associated trend for each of the service categories. The utilization trends used in pricing differ from the best-fit trends for the inpatient services. Blue Cross provides the fluctuation in inpatient utilization trends over the last few years as support for their recommended trend of 0.0% in place of the demonstrated 'Best R' fit trend of -2.6% that is provided in their utilization trend development. Every other service category uses the 'Best R' utilization trend, and while the other service categories may not see the fluctuation that the inpatient category sees, a review of the first quarter of 2020 provided in response to our questions by Blue Cross suggests the negative trend still holds. A reasonable assumption would be to use the best-fit trend of -2.6% for the inpatient utilization trend.

Exhibit AG-1 provides the impact of changing the utilization trends to those shown as the best-fit trends for all the service categories. These changes reduce the EHB rate from \$432.54 PMPM to \$427.88 PMPM, reducing the requested increase by 1.1%.

## **2) Contribution to Reserves for 2021.**

Page 15 of the Actuarial Memorandum states that Blue Cross has requested a 2.0% contribution to corporate reserves (Profit and Risk Load). Included in the 2.0% contribution factor is a 0.5% adjustment to account for the possibility of a funding shortfall associated with the state reinsurance program due to the program's reliance on tax collection and federal funds from the program savings. While this 2.0% contribution to reserves is a decrease of 1.0% from the 2020 rate filing, the RBC ratios provided by

Blue Cross over the last 3 years show a continued year-over-year increase, with a healthy 638% RBC ratio for 2019. An RBC ratio of 200% is the minimum surplus level needed for a health insurer to avoid regulatory action. The Blue Cross Association does have stricter guidelines, where RBC ratios below 375% would require internal monitoring. Even under the stricter company requirements, the current RBC levels are well above.

While the 2020 RBC ratio is not yet available, a reasonable assumption would be that the 2020 ratio could demonstrate a continued increase to reserves due to both the 3.0% contribution to reserves that was approved for the 2020 rates and the COVID-19 pandemic, which could likely result in lower than expected medical claims for 2020, therefore increasing the reserves. We believe a 0.0% contribution to reserves to be a reasonable and less conservative assumption. We believe their reserve position and the vulnerability of this population supports our recommendation.

Exhibit AG-2 provides the impact of reducing the contribution to reserves from 2.0% to 0.0%. This change reduces the EHB rate from \$432.54 PMPM to \$422.02 PMPM, reducing the requested increases by 2.4%.

3) [REDACTED]

In response to questions asked by OHIC regarding new high-cost drugs [REDACTED]  
[REDACTED], Blue Cross outlined the impact of a new market drug [REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] This change reduces the EHB rate from \$432.54 PMPM to \$429.40 PMPM, reducing the requested increases by 0.7%.

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[REDACTED]

**CONCLUSION**

In total, the adjustments to the rates that are recommended as shown in Exhibit AG-4 reduce Blue Cross's EHB rate from \$432.54 PMPM to \$414.44 PMPM reducing the projected rates by 4.2%. The Attorney General's recommended rates result in a weighted average increase of 1.2% compared on an apples-to-apples basis to Blue Cross's requested increase of 5.7%. The lower recommended weighted average rate increase would result in premium savings of approximately \$5.0 Million.

August 10, 2020

(Date)

Oliver Wyman Actuarial Consulting, Inc.

By:



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Beth Fritchen, FSA, MAAA



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Gabe Rivera, FSA, MAAA

# VI. EXHIBITS

## Exhibit AG 1 - Reduce Utilization Trends Rate Development

### Unified Rate Review v5.0

Company Legal Name	Blue Cross Blue Shield of Rhode Island	State	RI
HIOS Issuer ID	15287	Market	Individual
Effective Date of Rate Change(s)	1/1/2021		

### Market Level Calculations (Same for all Plans)

#### Section I: Experience Period Data

Experience Period:	1/1/2019	to	12/31/2019
		Total	PMPM
Allowed Claims		\$138,008,855.88	\$629.47
Reinsurance		\$0.00	\$0.00
Incurred Claims in Experience Period		\$112,203,427.79	\$511.42
Risk Adjustment		\$3,358,922.14	\$15.31
Experience Period Premium		\$119,517,209.91	\$544.76
Experience Period Member Months		219,394	

#### Section II: Projections

Benefit Category	Experience Period Index		Year 1 Trend		Year 2 Trend		Trended EHB Allowed Claims PMPM
	Rate PMPM	Cost	Utilization	Cost	Utilization	Rate PMPM	
Inpatient Hospital	\$123.13	1.026	0.974	1.035	0.974	1.036	\$124.04
Outpatient Hospital	\$162.78	1.021	1.036	1.030	1.036	1.036	\$183.73
Professional	\$172.12	0.884	1.040	1.025	1.040	1.040	\$168.68
Other Medical	\$12.8	0.884	1.040	1.025	1.040	1.040	\$11.94
Capitation	\$0.00	1.000	1.000	1.000	1.000	1.000	\$0.00
Prescription Drug	\$130.45	0.991	1.075	0.990	1.075	1.075	\$147.90
Total	\$600.66						\$636.30
Manual EHB Allowed Claims PMPM							\$0.00
Applied Credibility %							100.00%
Credibility Adjusted EHB Allowed Claims PMPM for Morbidity Adjustment		1/1/2021					\$636.30
Demographic Shift							1.000
Plan Design Changes							0.997
Other							0.926
Projected Index Rate for Reinsurance		1/1/2021					\$587.45
Risk Adjustment Payment/Charge							\$0.00
Exchange User Fees							\$19.57
Initial Quarter Market Adjusted Index Rate							1.62%
Projected Member Months							\$577.23
							\$122,179,401.85
							\$4,070,246.88
							\$1,944,875.29
							\$120,054,000.26

#### Section III: Calculation of EHB Rate for 21 Year Old, 0% Cost Sharing, Silver Utilization Level

##### Section III A: Market Adjusted Index Rate Silver Utilization Level

(1)	Experience Period Paid to Allowed Ratio	0.81
(2)	Paid to Allowed Ratio in Projection Period	0.78
(3)	Projected AV Metal Value	0.72
(4)	Adjustment to Silver Level Utilization	1.04
(5)	Initial Quarter Market Adjusted Index Rate Silver Utilization Level	\$597.75

##### Section III B: Retention Charge

	PMPM	% Charge
(6) Administrative Expense Load	\$108.31	14.5%
(7) ACA Fees and Taxes	\$0.63	0.1%
(8) Broker Commission	\$0.00	0.0%
(9) Premium Tax	\$14.90	2.0%
(10) Other Retention Charge	\$8.45	1.1%
(11) Contribution to Reserve	\$14.90	2.0%
(12) Investment Income Credit	-\$0.15	0.0%
(13) Total Retention Charge	\$147.03	19.7%
(14) 1/1/2021 or 1Q 2021 EHB Revenue Requirement for 0% cost sharing, silver utilization level (70%)	\$744.78	

##### Section III C: Average Rate Change

(15) Age Calibration to 21 year old	0.57	
(16) 1/1/2021 EHB Rate for 21 year old, 0% cost sharing, silver utilization level (70%)	\$427.88	Original Rate: \$432.54
(17) 1/1/2020 Approved EHB Rate for 21 year old, 0% cost sharing, silver utilization level (70%)	\$436.30	Percent Change: -1.1%

**Exhibit AG-2: Reduce Contribution to Reserves**

Company Legal Name	Blue Cross Blue Shield of Rhode Island	State	RI
HIOS Issuer ID	15287	Market	Individual
Effective Date of Rate Change(s)	1/1/2021		

**Market Level Calculations (Same for all Plans)**

**Section I: Experience Period Data**

Experience Period:	1/1/2019	to	12/31/2019
		Total	PMPM
Allowed Claims		\$138,100,855.88	\$629.47
Reinsurance		\$0.00	\$0.00
Incurred Claims in Experience Period		\$112,203,427.79	\$511.42
Risk Adjustment		\$3,358,922.14	\$15.31
Experience Period Premium		\$119,517,209.91	\$544.76
Experience Period Member Months		219,394	

**Section II: Projections**

Benefit Category	Year 1 Trend			Year 2 Trend			Trended EHB Allowed Claims PMPM
	Experience Period Index Rate PMPM	Cost	Utilization	Cost	Utilization	Utilization	
Inpatient Hospital	\$123.13	1.026	1.000	1.035	1.000	1.000	\$130.75
Outpatient Hospital	\$162.78	1.021	1.036	1.030	1.036	1.036	\$183.73
Professional	\$172.12	0.884	1.040	1.025	1.040	1.040	\$168.68
Other Medical	\$12.18	0.884	1.040	1.025	1.040	1.040	\$11.94
Capitation	\$0.00	1.000	1.000	1.000	1.000	1.000	\$0.00
Prescription Drug	\$130.45	0.991	1.075	0.990	1.075	1.075	\$147.90
Total	\$600.66						\$643.01
Manual EHB Allowed Claims PMPM				\$0.00			
Applied Credibility %				100.00%			
Credibility Adjusted EHB Allowed Claims PMPM for Morbidity Adjustment		1/1/2021		\$643.01			
Demographic Shift				1.000			
Plan Design Changes				0.997			
Other				0.926			
Projected Index Rate for Reinsurance		1/1/2021		\$593.64		\$123,467,825.21	
Risk Adjustment Payment/Charge				\$0.00		\$0.00	
Exchange User Fees				\$19.57		\$4,070,246.88	
Initial Quarter Market Adjusted Index Rate				1.62%		\$1,966,091.45	
Projected Member Months				\$583.52		\$121,363,669.78	
				207,984			

**Section III: Calculation of EHB Rate for 21 Year Old, 0% Cost Sharing, Silver Utilization Level**

**Section III A: Market Adjusted Index Rate Silver Utilization Level**

(1)	Experience Period Paid to Allowed Ratio	0.81
(2)	Paid to Allowed Ratio in Projection Period	0.78
(3)	Projected AV Metal Value	0.72
(4)	Adjustment to Silver Level utilization	1.04
(5)	Initial Quarter Market Adjusted Index Rate Silver Utilization Level	\$604.27

**Section III B: Retention Charge**

	PMPM	% Charge
(6)	Administrative Expense Load	\$106.82 14.5%
(7)	ACA Fees and Taxes	\$0.62 0.1%
(8)	Broker Commission	\$0.00 0.0%
(9)	Premium Tax	\$14.69 2.0%
(10)	Other Retention Charge	\$8.33 1.1%
(11)	Contribution to Reserve	\$0.00 0.0%
(12)	Investment Income Credit	-\$0.15 0.0%
(13)	Total Retention Charge	\$130.32 17.7%
(14)	1/1/2021 or 1Q 2021 EHB Revenue Requirement for 0% cost sharing, silver utilization level (70%)	\$734.59

**Section III C: Average Rate Change**

(15)	Age Calibration to 21 year old	0.57
(16)	1/1/2021 EHB Rate for 21 year old, 0% cost sharing, silver utilization level (70%)	\$422.02
(17)	1/1/2020 Approved EHB Rate for 21 year old, 0% cost sharing, silver utilization level (70%)	\$436.30
	Original Rate:	\$432.54
	Percent Change:	-2.4%

**Exhibit AG-3: Reduce [REDACTED] Projections**

Company Legal Name	Blue Cross Blue Shield of Rhode Island	State	RI
HIOS Issuer ID	15287	Market	Individual
Effective Date of Rate Change(s)	1/1/2021		

**Market Level Calculations (Same for all Plans)**

**Section I: Experience Period Data**

Experience Period:	1/1/2019	to	12/31/2019
	Total		PMPM
Allowed Claims	\$138,100,855.88		\$629.47
Reinsurance	\$0.00		\$0.00
Incurred Claims in Experience Period	\$112,203,427.79		\$511.42
Risk Adjustment	\$3,358,922.14		\$15.31
Experience Period Premium	\$119,517,209.91		\$544.76
Experience Period Member Months	219,394		

**Section II: Projections**

Benefit Category	Year 1 Trend			Year 2 Trend			Trended EHB Allowed Claims PMPM
	Experience Period Index Rate PMPM	Cost	Utilization	Cost	Utilization	Claims PMPM	
Inpatient Hospital	\$123.13	1.026	1.000	1.035	1.000	\$130.75	
Outpatient Hospital	\$162.78	1.021	1.036	1.030	1.036	\$183.73	
Professional	\$172.12	0.884	1.040	1.025	1.040	\$168.68	
Other Medical	\$12.18	0.884	1.040	1.025	1.040	\$11.94	
Capitation	\$0.00	1.000	1.000	1.000	1.000	\$0.00	
Prescription Drug	\$130.45	0.991	1.075	0.990	1.075	\$147.90	
Total	\$600.66					\$643.01	

  

Manual EHB Allowed Claims PMPM	\$0.00
Applied Credibility %	100.00%
Credibility Adjusted EHB Allowed Claims PMPM for Morbidity Adjustment	\$643.01
Demographic Shift	1.000
Plan Design Changes	0.990
Other	0.926

  

	1/1/2021	Projected Period Totals
Projected Index Rate for Reinsurance	\$589.47	\$122,600,949.81
Risk Adjustment Payment/Charge	\$0.00	\$0.00
Exchange User Fees	\$19.57	\$4,070,246.88
Initial Quarter Market Adjusted Index Rate	1.62%	\$1,951,816.82
	\$579.29	\$120,482,519.75

  

Projected Member Months	207,984
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**Section III: Calculation of EHB Rate for 21 Year Old, 0% Cost Sharing, Silver Utilization Level**

**Section III A: Market Adjusted Index Rate Silver Utilization Level**

(1)	Experience Period Paid to Allowed Ratio	0.81
(2)	Paid to Allowed Ratio in Projection Period	0.78
(3)	Projected AV Metal Value	0.72
(4)	Adjustment to Silver Level utilization	1.04
(5)	Initial Quarter Market Adjusted Index Rate Silver Utilization Level	\$599.88

**Section III B: Retention Charge**

	PMPM	% Charge
(6)	Administrative Expense Load	\$108.69 14.5%
(7)	ACA Fees and Taxes	\$0.63 0.1%
(8)	Broker Commission	\$0.00 0.0%
(9)	Premium Tax	\$14.95 2.0%
(10)	Other Retention Charge	\$8.48 1.1%
(11)	Contribution to Reserve	\$14.95 2.0%
(12)	Investment Income Credit	-\$0.15 0.0%
(13)	Total Retention Charge	\$147.55 19.7%
(14)	1/1/2021 or 1Q 2021 EHB Revenue Requirement for 0% cost sharing, silver utilization level (70%)	\$747.43

**Section III C: Average Rate Change**

(15)	Age Calibration to 21 year old	0.57
(16)	1/1/2021 EHB Rate for 21 year old, 0% cost sharing, silver utilization level (70%)	\$429.40
(17)	1/1/2020 Approved EHB Rate for 21 year old, 0% cost sharing, silver utilization level (70%)	\$436.30

  

Original Rate:	\$432.54
Percent Change:	-0.7%

Exhibit AG-4: All Adjustments – Summary of Changes

Company Legal Name:	Blue Cross Blue Shield of Rhode Island	State:	RI
HIOS Issuer ID:	15287	Market:	Individual
Effective Date of Rate Change(s):	1/1/2021		

**Market Level Calculations (Same for all Plans)**

**Section I: Experience Period Data**

Experience Period:	1/1/2019	to	12/31/2019
	Total		PMPM
Allowed Claims	\$138	100 855.88	\$629.47
Reinsurance	\$0.00		\$0.00
Incurred Claims in Experience Period	\$112	203 427.79	\$511.42
Risk Adjustment	\$3	358 922.14	\$15.31
Experience Period Premium	\$119	517 209.91	\$544.76
Experience Period Member Months		219 394	

**Section II: Projections**

Benefit Category	Year 1 Trend			Year 2 Trend			Trended EHB Allowed Claims PMPM
	Experience Period Index Rate PMPM	Cost	Utilization	Cost	Utilization	Claims PMPM	
Inpatient Hospital	\$123.13	1.026	0.974	1.035	0.974	\$124.04	
Outpatient Hospital	\$162.78	1.021	1.036	1.030	1.036	\$183.73	
Professional	\$172.12	0.884	1.040	1.025	1.040	\$168.68	
Other Medical	\$12.18	0.884	1.040	1.025	1.040	\$11.94	
Capitation	\$0.00	1.000	1.000	1.000	1.000	\$0.00	
Prescription Drug	\$130.45	0.991	1.075	0.990	1.075	\$147.90	
Total	\$600.66					\$636.30	

Manual EHB Allowed Claims PMPM	\$0.00
Applied Credibility %	100.00%

Credibility Adjusted EHB Allowed Claims PMPM for 1/1/2021	\$636.30
Morbidity Adjustment	1.000
Demographic Shift	1.000
Plan Design Changes	0.990
Other	0.926

	1/1/2021	Projected Period Totals
Projected Index Rate for Reinsurance	\$583.32	\$121 321 572.55
Reinsurance	\$0.00	\$0.00
Risk Adjustment Payment/Charge	\$19.57	\$4 070 246.88
Exchange User Fees	1.62%	\$1 930 749.62
Initial Quarter Market Adjusted Index Rate	\$573.03	\$119 182 075.29

Projected Member Months	207 984
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**Section III: Calculation of EHB Rate for 21 Year Old, 0% Cost Sharing, Silver Utilization Level**

**Section III A: Market Adjusted Index Rate Silver Utilization Level**

(1) Experience Period Paid to Allowed Ratio	0.81
(2) Paid to Allowed Ratio in Projection Period	0.78
(3) Projected AV Metal Value	0.72
(4) Adjustment to Silver Level utilization	1.04
(5) Initial Quarter Market Adjusted Index Rate Silver Utilization Level	\$593.41

**Section III B: Retention Charge**

	PMPM	% Charge
(6) Administrative Expense Load	\$104.91	14.5%
(7) ACA Fees and Taxes	\$0.61	0.1%
(8) Broker Commission	\$0.00	0.0%
(9) Premium Tax	\$14.43	2.0%
(10) Other Retention Charge	\$8.18	1.1%
(11) Contribution to Reserve	\$0.00	0.0%
(12) Investment Income Credit	-\$0.14	0.0%
(13) Total Retention Charge	\$127.98	17.7%
(14) 1/1/2021 or 1Q 2021 EHB Revenue Requirement for 0% cost sharing, silver utilization level (70%)	\$721.39	

**Section III C: Average Rate Change**

(15) Age Calibration to 21 year old	0.57	
(16) 1/1/2021 EHB Rate for 21 year old, 0% cost sharing, silver utilization level (70%)	\$414.44	Original Rate: \$432.54
(17) 1/1/2020 Approved EHB Rate for 21 year old, 0% cost sharing, silver utilization level (70%)	\$436.30	Percent Change: -4.2%