

## Delaware Health Insurance Rate Filing Requirements

### Part II Preliminary Justification—Content and Format Requirements

*The Delaware Insurance Department (DOI) requires all health insurance companies, also referred to as “Issuers”, who submit Rate Filings for products offered in the single risk pool in the individual and small group market to submit a Part II Preliminary Justification, regardless of whether the rate filing reflects a positive, negative or neutral rate change.*

*Beginning with Rate Filings for Coverage Year 2017, the DOI is implementing the following content requirements and format guidelines to enhance transparency for consumers and to ensure consistency of information across Issuers. The DOI requests that companies address each item within each section and in the sequence outlined below. **Issuers are reminded to use clear, consumer-friendly language to promote broad public understanding.***

#### General Information

- Company Legal Name **Highmark BCBSD Inc.**
- Market for which proposed rates apply (Individual or Small Group) **Individual Market**
- Total proposed rate change (increase/decrease) **4.0%**
- Effective date of proposed rate change **January 1, 2022**

#### Summary

- Provide a brief narrative summary of the scope and range of the rate change (i.e., increase or decrease) as well as the number of people impacted. Include how the rate change varies across products/plans.

**Highmark DE is requesting an average plan level rate increase of 4.0% based on the projected enrollment mix by plan. The plan level rate changes will impact an estimated 26,568 current members. The rate change will vary by product ranging from a minimum of 1.7% to a maximum of 14.7%.**

- Provide a summary of the historical revenue, claims, expenses and profit on the product(s), and how the rate change should impact these in the future.

**Attachment B - Supplemental Health Care Exhibit contains a summary of revenue, claims and expenses. Revenue is expected to decrease with the rate change, claims are expected to increase with trend.**

- Provide a chart (example below) listing all components of the proposed rate change (increase/decrease). Please note the factors used in this chart are for illustrative purposes only and the Company should use factors pertaining to their proposed rate change. All factors should multiply to the Total Proposed Rate Change (increase/decrease).

**Please see table on the following page.**

|   |             |
|---|-------------|
| BEP claims relative to projected 2019 claims in 2020 filing           | 0.0%        |
| Projected Rx rebates and provider settlements                         | -0.7%       |
| 2020 to 2021 Trend  | -0.9%       |
| 2021 to 2022 Trend  | 8.6%        |
| Retention   | -2.3%       |
| Risk Adjustment   | 0.0%        |
| Reinsurance   | 1.0%        |
| Morbidity, including morbidity impact of reinsurance program          | 0.1%        |
| Covid - Projected Impact (Vaccine, Testing, Treatment, and morbidity) | -1.5%       |
| Plan Design/Miscellaneous   | 0.0%        |
| <b>Average Rate Change</b>  | <b>4.0%</b> |

- State the proposed average rate change (increase/decrease). *(Must match the proposed average rate change as indicated in HIOS, Actuarial Memorandum and Company Rate Information Page in SERFF. Please note that the average rate change reported in all three locations should match.)*

**The proposed average rate change is 4.0%**

- Provide a brief explanation for the rate change in each of the factors shown in the chart.

**Base Experience – decrease in CMS required starting claim base for rate development.**

**Retention – net change in retention components including administrative expense, taxes, licenses and fees, and profit and risk.**

**1332 State Innovation Waiver for Reinsurance – increase in costs due to decrease in reimbursement from State of Delaware’s 1332 State Innovation Waiver for reinsurance program.**

**Morbidity – The morbidity adjustment reflects multiple changes, including blending of the ACA pool and new members from multiple sources including uninsured and the employer markets.**

**Product Design and miscellaneous- the projected weighting of member purchases by plan as well as other miscellaneous factors in the rating process make up the remainder of the rate impact.**

### **Reason for Proposed Rate Change (Increase/Decrease)**

- Provide a brief narrative discussing all the reasons for the proposed rate change in Delaware, including, but not limited to:
  - How provider costs and utilization contribute to the need for the rate change
  - How legally required benefit changes contribute to the need for the rate change

- How administrative costs and anticipated profits contribute to the need for the rate change

**The proposed rate change is due to the items discussed in the above proposed rate chart.**

**Due to changes in provider costs and additional utilization of the population, the assumed trend is a necessary component of the change.**

**State and Federal mandates contributes approximately 1% to the rate increase**

**The loss of enforcement of the individual mandate and Cost Share Reduction reimbursement are also reflected in the rate change.**

**Ongoing Covid19 impact, treatment and vaccination programs and are expected to increase claim costs in 2022.**

**Effect of the Average Proposed Rate Change (Increase/Decrease) on Policyholders**

- Provide the period for which the rates will apply.

**January 1, 2022 – December 31, 2022**

- Provide the number of members affected by the proposed rate change.

**26,568 members**

- Provide a brief narrative discussing new plans, plans that are not renewed and whether the proposed rate change applies to all plans. If no, provide a listing of all proposed rate changes by product/plan.

**All 2021 EPO plans are being terminated and the similar PPO products with broad network access will be offered in 2022. New plans and non-renewed plans are NOT included in the overall average rate change calculation for 2022. Highmark is introducing sixteen new plans with broader network access:**

| <b>HIOS</b>    | <b>Plan Name</b>  |
|----------------|---|
| 76168DE0690005 | my Blue Access PPO Platinum 0                               |
| 76168DE0700005 | my Blue Access PPO Platinum 0 + Adult Dental and Vision     |
| 76168DE0690004 | my Blue Access PPO Gold 0                                   |
| 76168DE0700004 | my Blue Access PPO Gold 0 + Adult Dental and Vision         |
| 76168DE0730001 | my Blue Access PPO Premier Gold 0                           |
| 76168DE0740002 | my Blue Access PPO Premier Gold 0 + Adult Dental and Vision |
| 76168DE0710003 | my Blue Access PPO Gold 1400 HSA                            |
| 76168DE0690003 | my Blue Access PPO Silver 2600                              |
| 76168DE0700003 | my Blue Access PPO Silver 2600 + Adult Dental and Vision    |
| 76168DE0690002 | my Blue Access PPO Silver 2900                              |

|                |  |
|----------------|--|
| 76168DE0700002 | my Blue Access PPO Silver 2900 + Adult Dental and Vision |
| 76168DE0710002 | my Blue Access PPO Silver 3250 HSA                       |
| 76168DE0690001 | my Blue Access PPO Bronze 3800                           |
| 76168DE0700001 | my Blue Access PPO Bronze 3800 + Adult Dental and Vision |
| 76168DE0710001 | my Blue Access PPO Bronze 6900 HSA                       |
| 76168DE0720001 | my Blue Access Major Events PPO 8700 - 3 Free PCP Visits |

- Discuss why the rate changes vary and how they vary.

**Rate changes vary depending on actuarial value, benefit richness and eligibility for catastrophic coverage.**

### **Medical Loss Ratio (MLR)**

*Under the ACA, at least 80% of the premiums collected by health plans are expected to pay for medical care and activities that improve health care quality for members. If the actual MLR falls below 80%, the insurance company will issue rebates to members in accordance with the law.*

- What is the projected MLR for the proposed rate(s)?

**The anticipated medical loss ratio is about 90% relative to total premium less taxes and fees. This loss ratio is calculated consistently with the federally prescribed MLR methodology.**

- How does the proposed rate change (increase/decrease) align with the projected MLR?

**The anticipated medical loss ratio is about 90% relative to total premium less taxes and fees. This loss ratio is calculated consistently with the federally prescribed MLR methodology.**

- What types of activities does the Company conduct to improve the health care quality for members that are included as part of the 80% (or greater) share?

**Highmark Delaware continues to focus efforts on care management activities in order to lower the future medical cost for its members. Clinical teams, led by experienced doctors and nurses, analyse claim data to identify opportunities for more efficient care delivery and lower medical cost trends.**

- Discuss specifically what the Company is doing to keep premiums affordable.

**Highmark Delaware products are aimed at improving the quality, effectiveness, and efficiency of care. As health care continues to evolve, Highmark Delaware remains committed to providing a variety of product offerings like telehealth visits, to meet the needs of individuals and families.**