## Responses to Objections (Received on 9/26/2022)

## Objection 1 -

## Comments:

Regarding the list of changes for this filing compared to the 2020 approved filing, please provide the following:
a. Detailed explanation of the changes in methodology for Utilization Dampening, Non-Par, and Network Utilization. Please confirm these are the only methodology changes, and all other changes to the rate manual are quantitative (e.g., factor updates). Otherwise, provide detailed explanation of the methodology changesfor those not listed in this question.
b. Comparison of the rating components that changed by $+/-10 \%$ or more, and include detailed explanation for such change.

## Response:

a. UD: Utilization dampening captures the change in members' utilization behavior in response to the richness of their plan design. The methodology was updated to be based upon specific plan design characteristics rather than overall member cost share. The factors aligning with these characteristics can be found in Table 8 - Medical Utilization Dampening.

Non-Par: Maximum Reimbursable Charge (MRC) represents the maximum reimbursement under the customer's medical plan that Cigna will pay a non-network health care professional (HCP) for a given service. MRC adjustments are applied to Out-of-Network (OON) claims only, whereas previously, MRC adjustments were applied to the Point-of-Service (POS) load that was used to calculate blended expected In-Network (IN) and OON claims from IN claims.

Network Utilization: Network Utilization capturesthe split in members' utilization between IN and OON claims. The network utilization calculation previously included the use of a POS load applied to IN rates to blend the IN and OON base medical claim costs. The updated network utilization is applied using Table 27 - Network Utilization Adjustment in order to calculate the predicted allowed IN and OON claims.

Yes, these are the only methodology changes and all other changes to the rate manual are quantitative.
b. See 2022 CHLIC - VT Side by Side.xlsx. This compares the approved and proposed factor tables in the rate manual. The changes reflect two years of updates and new information so the magnitude may be larger than normal. Here are a couple notable changes:

- Medical Area Factors: The national average area factor has decreased below 1.0 over time so the increase reflects a calibration adjustment to get the national area factor to be centered at 1.0 rather than a true cost increase in VT.
- MHSUD: Mental health service utilization has drastically increased since 2020 driving the large increase.


## Comments:

Regarding the Comparison to Status Quo table on page 3 of the act memo, please provide the following:
a. Breakdown of the "Revisions to Pricing Factors" line item, showing the impact of each rating factor change and how they equate to the combined average, minimum, and maximum percentages shown.
b. Breakdown of the "Expense Changes" line item, showing the impact/changes for each of the retention components. Further, please explain the reason for these changes.
c. Please confirm that the $7.5 \%$ listed as 'Filed and Approved Claims Trend' does not equate to the previously approved trend of $6.5 \%$, but rather is the proposed trend rate for 2023+. If not, please reconcile.

## Response:

a. The 'Revisions to Pricing Factors' captureschanges driven by analysis of retrospective experience and changes in methodology. To calculate this, we first run the current production engine with the proposed effective date. Then we run another engine that include proposed methodology, area factor, and trend updates with the same proposed effective date. By using the same effective dates, the rate change reflects only methodology updates and no trend impact.

To categorize/separate all the changes, we would need to create multiple engine versions and run multiple batches. This would be a large administrative burden so only the cumulative impact of all methodology changes can be provided. Full details of the individual factor changes can be found on 2022 CHLIC - VT Side by Side.xlsx from \#1b.
b. The "Expense Changes" line item reflects the year-over-year change in target loss ratio. A comparison of the proposed and approved retention components is provided in the table below:

| Component | Proposed | Approved | Change | Comments |
| :--- | :---: | :---: | :---: | :--- |
| Admin | $5.0 \%$ | $5.5 \%$ | $-0.5 \%$ | Lower average admin breakeven expenses as a <br> percentage of premium |
| Access Fee | $0.8 \%$ | $1.1 \%$ | $-0.3 \%$ | Lower average access breakeven expenses as a <br> percentage of premium |
| Quality Improvement | $0.2 \%$ | $0.2 \%$ | $0.0 \%$ |  |
| Tax | $2.0 \%$ | $2.0 \%$ | $0.0 \%$ |  |
| State Assessments | $2.0 \%$ | $2.0 \%$ | $0.0 \%$ |  |
| PPACA Fees | $0.0 \%$ | $2.5 \%$ | $-2.5 \%$ | PPACA fees are primarily associated with the <br> Health Insurance Industry Fee (HIIF), which is <br> assumed to be 2.5\% for 2020 calendar months, <br> and 0\% for 2021+calendar months due to <br> legislative changes. |
| Risk Charge | $0.0 \%$ | $0.0 \%$ | $0.0 \%$ |  |
| Profit | $2.0 \%$ | $-1.5 \%$ | $3.5 \%$ | Increasing profit to a rea sonable level |
| Commissions | $0.0 \%$ | $0.0 \%$ | $0.0 \%$ |  |
| Total Retention | $12.1 \%$ | $11.8 \%$ | $0.3 \%$ |  |
| Targeted MLR | $87.9 \%$ | $88.2 \%$ | $-0.3 \%$ |  |

c. Per CCGP-132206853, the prior approved trend factors is $6.8 \%$ rather than the stated $6.5 \%$. The actuarial memorandum has been revised to show the following exhibit:

| Category | Detail | Avg | Min | Max |
| :--- | :--- | :---: | :---: | :---: |
| Filed and Approved <br> Claims Trend | Filed and Approved Claims Trend | $6.8 \%$ | $6.8 \%$ | $6.8 \%$ |
| Revisions to <br> Pricing Factors | Changes to trend, area factors, and methodology <br> since approved 1/1/2020 filing | $0.5 \%$ | $-26.7 \%$ | $22.5 \%$ |
| Expense Changes | MLR change since our last approved filing <br> $(88.2 \%->87.9 \%)$ | $0.3 \%$ | $0.3 \%$ | $0.3 \%$ |
| Requested <br> Rate Change | = [(1+trend)*(1+factor changes) <br> $*(1+e x p e n s e ~ c h a n g e s)] ~-1 ~$ | $7.6 \%$ | $-21.5 \%$ | $31.3 \%$ |

This categorization change does not impact the average, minimum, and maximum requested rate change.

## Objection 3 -

## Comments:

Please provide a comparison of the medical, Rx, and combined trends in this filing versus the previously approved filing, broken out by cost, utilization, and total trend components. Please provide both quantitative and qualitative support for the changes.

## Response:

A comparison of the medical and $R x$ trends in this filing versus the previously approved filing is provided below. However, the trends assumptions used reflect different years between the two filings so a direct comparison is not meaningful.


| Med Approved |  |  |
| :---: | :---: | :---: |
| Vermont In-Network Trend |  |  |
| 2019 | Weight | Unit |
| IP | 18.1\% | 5.3\% |
| OP | 42.3\% | 3.2\% |
| Pro | 21.8\% | 0.6\% |
| OMS | 17.8\% | 7.2\% |
| Unit Cost | 100.0\% | 3.74\% |
| Util |  | 1.86\% |
| Mix |  | 1.57\% |
| Total Trend |  | 7.33\% |
| Vermont In-Network Trend |  |  |
| 2020 | Weight | Unit |
| IP | 18.4\% | 4.4\% |
| OP | 42.1\% | 4.0\% |
| Pro | 21.2\% | 1.2\% |
| OMS | 18.3\% | 7.2\% |
| Unit Cost | 100.0\% | 4.06\% |
| Util |  | 2.19\% |
| Mix |  | 1.59\% |
| Total Trend |  | 8.03\% |

Rx Proposed

|  | $2020 / 2019$ | $2021 / 2020$ | $2022+/ 2021$ |
| :---: | :---: | :---: | :---: |
| Cost Trend | $9.87 \%$ | $7.10 \%$ | $8.80 \%$ |
| Utilization | $0.97 \%$ | $0.73 \%$ | $-0.26 \%$ |
| Trend <br> Total Trend | $10.94 \%$ | $7.89 \%$ | $8.52 \%$ |

Rx Approved

|  | $2019 / 2018$ | $2020+/ 2019$ |
| :---: | :---: | :---: |
| Cost Trend | $7.30 \%$ | $6.10 \%$ |
| Utilization <br> Trend <br> Total Trend | $1.10 \%$ | $0.60 \%$ |

## Objection 4 -

## Comments:

Please confirm and show that the base claim costs are the same as the previously approved filing, only adjusted for trend. Otherwise, demonstrate any adjustments made to the base experience for this filing, including adjustments for COVID-19.

## Response:

The values in the Medical Base Claims table come from the Claims Probability Distribution (CPD), which was updated between these two rate manual filings. The new table incorporates methodology changes to our CPD. The new table uses FY 2018 data. The OON rates from the updated table are far lower because they are reflecting the lower utilization of OON. In the previous table, the OON rates reflected MSC base rates prior to incorporating utilization, however today we take OON utilization into account in the base rate table. While the experience is the same for both rate manuals, the methodology of the base claims has changed. The new CPD has more granular service categories and the frequency uses member month weights to account for turnover. No adjustments were made for COVID-19.

Objection 5 -

## Comments:

Please confirm whether the Historical claims experience for Vermont provided in "VT 2023
Supplemental Exhibits.pdf" includes both medical and pharmacy experience, or medical only.

## Response:

The historical claims experience for Vermont provided in "VT 2023 Supplemental Exhibits.pdf" includes both medical and pharmacy experience.

Objection 6 -

## Comments:

Please provide at least three years of historical actual-to-expected retention, separately for profit and all other retention components.

## Response:

Actual-to-expected retention for 2019 to 2021 is provided in the tables below:

| 2019 Retention A/E | Actual | Expected | A/E |
| :--- | :---: | :---: | :---: |
| Admin \& Access Fee | $8.2 \%$ | $5.6 \%$ | $146 \%$ |
| Quality Improvement | $0.8 \%$ | $0.1 \%$ | $808 \%$ |
| Premium Tax and State Assessment | $1.8 \%$ | $3.7 \%$ | $48 \%$ |
| PPACA Fees | $0.0 \%$ | $0.0 \%$ | --- |
| Profit | $-2.1 \%$ | $1.0 \%$ | $-207 \%$ |
| Other | $0.0 \%$ | $0.0 \%$ | --- |
| Total | $8.7 \%$ | $10.4 \%$ | $84 \%$ |


| 2020 Retention A/E | Actual | Expected | A/E |
| :--- | :---: | :---: | :---: |
| Admin \& Access Fee | $5.8 \%$ | $6.6 \%$ | $87 \%$ |
| Quality Improvement | $0.8 \%$ | $0.2 \%$ | $400 \%$ |
| Premium Tax and State Assessment | $1.6 \%$ | $4.0 \%$ | $40 \%$ |
| PPACA Fees | $1.9 \%$ | $2.5 \%$ | $76 \%$ |
| Profit | $9.1 \%$ | $-1.5 \%$ | $-608 \%$ |
| Other | $0.0 \%$ | $0.0 \%$ | --- |
| Total | $19.2 \%$ | $11.8 \%$ | $163 \%$ |


| 2021 Retention A/E | Actual | Expected | A/E |
| :--- | :---: | :---: | :---: |
| Admin \& Access Fee | $6.7 \%$ | $6.6 \%$ | $101 \%$ |
| Quality Improvement | $0.2 \%$ | $0.2 \%$ | $85 \%$ |
| Premium Tax and State Assessment | $1.6 \%$ | $4.0 \%$ | $41 \%$ |
| PPACA Fees | $0.0 \%$ | $2.5 \%$ | $2 \%$ |
| Profit | $-1.6 \%$ | $-1.5 \%$ | $104 \%$ |
| Other | $0.0 \%$ | $0.0 \%$ | --- |
| Total | $7.0 \%$ | $11.8 \%$ | $59 \%$ |

The last approved filing is for 2020 so 2020 and 2021 expected retention values are the same.

## Objection 7 -

## Comments:

Please further explanation the reason for the variation in the requested rate change, $-21.5 \%$ to $31.3 \%$. Please provide an example calculation of the minimum and maximum rate change.

## Response:

Methodology changes as described in \#1a can cause case-level variances. Despite the wide range, the aggregate impact is kept neutral and is centered close to zero. As noted in \#2a, it's not possible to breakdown the rate change impact of every change so only the cumulative rate change can be provided.

## Objection 8 -

## Comments:

As shown in the "Rate Review Detail" in SERFF, the weighted average prior rate is $\$ 711.07$ PMPM. Please illustrate how this amount reconciles to the approved rate from the 2020 filing.

## Response:

The prior rates and the requested rates are illustrative values to derive a requested rate change so they won't exactly tie to the approved rate. A newer book of business is used to calculate the requested rate change so the prior rate is adjusted to normalize the difference in accounts. This difference becomes more pronounced as it has been two years since the approved filing.

## Objection 9 -

## Comments:

The State is gathering how much the commercial insurers contribute to the Blueprint program on a yearly basis. Will you please provide the aggregate dollar amount and corresponding PMPM amounts for your company for this program?

## Response:

The aggregate dollar amount and corresponding PMPM amounts contributed to the Blueprint program for calendar year 2021 is:

| Quarter | Total Amount | Member Months | PMPM |
| :---: | :---: | :---: | :---: |
| Q1 | $\$ 14,493$ | 1,505 | $\$ 3.21$ |
| Q2 | $\$ 15,389$ | 1,598 | $\$ 3.21$ |
| Q3 | $\$ 15,338$ | 1,593 | $\$ 3.21$ |
| Q4 | $\$ 15,472$ | 1,607 | $\$ 3.21$ |
| 2021 | $\$ 60,693$ | 6,303 | $\$ 3.21$ |

This does not reflect the quarterly payments to the Community Health Team which are calculated and provided by VT Blueprint.

Trend
Medical Trend - Unleveraged

|  |  |  | Current |  |  |  | Proposed |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Area Description | Rating Area | Product | 2020/2019 | 2021/2020 | 2022/2021 | 2023+12022 | 2020/2019 | 2021/2020 | 2022/2021 | 2023+/2022 | 2020/2019 | 2021/2020 | 2022/2021 | 2023+/2022 |
| VT, VERMONT | VTNWK1 | NWK | 7.96\% | 6.87\% | 6.87\% | 6.87\% | 9.41\% | 10.49\% | 6.92\% | 7.58\% | 1.45\% | 3.62\% | 0.05\% | 0.71\% |
| VT, VERMONT | VTOAP1 | OAP | 7.96\% | 6.87\% | 6.87\% | 6.87\% | 9.41\% | 10.49\% | 6.92\% | 7.58\% | 1.45\% | 3.62\% | 0.05\% | 0.71\% |
| VT, VERMONT | VTPPO1 | PPO | 7.96\% | 6.87\% | 6.87\% | 6.87\% | 9.41\% | 10.49\% | 6.92\% | 7.58\% | 1.45\% | 3.62\% | 0.05\% | 0.71\% |

## Area Factors

## Medical Area Factors

|  |  | Current |  | Proposed |  |
| :--- | :--- | :---: | :---: | :---: | :---: |
| Rating Area |  | Region | Product | Area Factor | Area Factor |
| Change |  |  |  |  |  |
| VTNWK1 | NWK | 0.71 | 0.87 | $23 \%$ |  |
| VTOAP1 | VT, VERMONT | OAP | 0.71 | 0.87 | $23 \%$ |
| VTPPO1 | VT, VERMONT | PPO | 0.73 | 0.90 | $23 \%$ |


| Current | Major Service Categories |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Inpatient (Hospital) | Outpatient (Hospital) | ER | PCP | SCP | Other | Preventive |
| Facility | 83.50\% | 55.00\% | 100.00\% | 0.00\% | 0.00\% | 100.00\% | N/A |
| Professional | 16.50\% | 17.00\% | 0.00\% | 90.00\% | 81.00\% | 0.00\% | N/A |
| Lab | 0.00\% | 6.80\% | 0.00\% | 8.00\% | 3.60\% | 0.00\% | N/A |
| Radiology | 0.00\% | 10.20\% | 0.00\% | 2.00\% | 5.40\% | 0.00\% | N/A |
| Advanced Radiology (ARI) | 0.00\% | 11.00\% | 0.00\% | 0.00\% | 10.00\% | 0.00\% | N/A |
| Proposed | Major Service Categories |  |  |  |  |  |  |
|  | Inpatient (Hospital) | $\begin{aligned} & \text { Outpatient } \\ & \text { (Hospital) } \end{aligned}$ | ER | PCP | SCP | Other | Preventive |
| Facility | 70.50\% | 58.10\% | 100.00\% | 0.00\% | 0.00\% | 100.00\% | 0.00\% |
| Professional | 29.50\% | 10.40\% | 0.00\% | 97.40\% | 78.40\% | 0.00\% | 100.00\% |
| Lab | 0.00\% | 13.30\% | 0.00\% | 1.00\% | 6.20\% | 0.00\% | 0.00\% |
| Radiology | 0.00\% | 8.50\% | 0.00\% | 1.60\% | 9.40\% | 0.00\% | 0.00\% |
| Advanced Radiology (ARI) | 0.00\% | 9.70\% | 0.00\% | 0.00\% | 6.10\% | 0.00\% | 0.00\% |
| Change | Major Service Categories |  |  |  |  |  |  |
|  | Inpatient (Hospital) | Outpatient (Hospital) | ER | PCP | SCP | Other | Preventive |
| Facility | -13.00\% | 3.10\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% | 0.00\% |
| Professional | 13.00\% | -6.60\% | 0.00\% | 7.40\% | -2.60\% | 0.00\% | 0.00\% |
| Lab | 0.00\% | 6.50\% | 0.00\% | -7.00\% | 2.60\% | 0.00\% | 0.00\% |
| Radiology | 0.00\% | -1.70\% | 0.00\% | -0.40\% | 4.00\% | 0.00\% | 0.00\% |
| Advanced Radiology (ARI) | 0.00\% | -1.30\% | 0.00\% | 0.00\% | -3.90\% | 0.00\% | 0.00\% |

Preventive Care Child Age Adjustment
Current

| Elected Child Age | Portion of Preventive Care Base Claim <br> Cost |
| :--- | :--- |
| $\leq 2$ | 0.16 |
| 3 to 64 | Linearly interpolate between 0.16 at 2 and <br> 1.0 at 65 |
| $\geq 65$ | 1 |


| Proposed |  |
| :---: | :---: |
| Elected Child Age | Portion of Preventive Care Base Claim Cost |
| 0 | 0.0307 |
| 1 | 0.0635 |
| 2 | 0.0972 |
| 3 | 0.1316 |
| 4 | 0.167 |
| 5 | 0.2039 |
| 6 | 0.2414 |
| 7 | 0.2794 |
| 8 | 0.3176 |
| 9 | 0.3561 |
| 10 | 0.3954 |
| 11 | 0.4357 |
| 12 | 0.4771 |
| 13 | 0.5202 |
| 14 | 0.5636 |
| 15 | 0.607 |
| 16 | 0.6509 |
| 17 | 0.6955 |
| 18 | 0.7393 |
| 19 | 0.7821 |
| 20 | 0.8249 |
| 21 | 0.8661 |
| 22 | 0.9048 |
| 23 | 0.9401 |
| 24 | 0.9719 |
| 25 | 1 |

Change

|  |
| :--- |
|  |
|  |
|  |

## Medical Effective Deductible Adjustment



\begin{tabular}{|c|c|c|c|c|c|c|c|c|c|c|c|c|c|c|c|c|c|c|}
\hline \multicolumn{2}{|l|}{\multirow[t]{2}{*}{Proposed}} \& \multicolumn{17}{|c|}{Plan Deductible} \\
\hline \& \& 0 \& 50 \& 100 \& 150 \& 200 \& \& 300 \& 400 \& 500 \& 750 \& 1000 \& \& 1500 \& 2000 \& 2250 \& 2500 \& 3000 \\
\hline \multirow{33}{*}{} \& 1 \& \({ }^{1}\) \& 0.445 \& \({ }^{0.434}\) \& \({ }^{0.435}\) \& \& \({ }^{0.436}\) \& 0.438 \& 0.44 \& 0.444 \& 0.454 \& \& \({ }^{0.462}\) \& 0.479 \& 0.499 \& \({ }^{0.506}\) \& 0.514 \& \({ }^{0.528}\) \\
\hline \& \({ }^{1.25}\) \& 1 \& 0.505 \& 0.518 \& 0.518 \& \& 0.517 \& 0.517 \& 0.521 \& 0.538 \& 0.554 \& \& 0.568 \& \({ }^{0.593}\) \& \({ }^{0.614}\) \& \({ }^{0.623}\) \& 0.632 \& \({ }^{0.649}\) \\
\hline \& \(\begin{array}{r}1.5 \\ 1.75 \\ \hline\end{array}\) \& 1 \& 0.617 \& 0.61 \& 0.61 \& \& \({ }_{0}^{0.61}\) \& -0.614 \& \({ }_{\substack{0.621 \\ 0.713}}\) \& -0.629 \& -0.647 \& \& - 0.67 \& 0.693 \& \({ }^{0.716}\) \& 0.725 \& \({ }^{0.735}\) \& \({ }_{0}^{0.751} 0\) \\
\hline \& 1.15 \& 1 \& \({ }_{0}^{0.699}\) \& \({ }_{0}^{0.699}\) \& \({ }_{0}^{0.979}\) \& \& 0.801 \& \({ }_{0}^{0.802}\) \& \({ }_{0}^{0.804}\) \& \({ }_{0}^{0.807}\) \& 0.817 \& \& \({ }_{0}^{0.884}\) \& \({ }_{0}^{0.854}\) \& \({ }_{0}^{0.874}\) \& \({ }_{0}^{0.883}\) \& 0.859
0.89 \& 0.905 \\
\hline \& 2.25 \& 1 \& 0.826 \& 0.832 \& 0.831 \& \& 0.836 \& \({ }^{0.838}\) \& 0.844 \& 0.854 \& 0.87 \& \& 0.885 \& 0.907 \& 0.925 \& 0.932 \& 0.939 \& 0.95 \\
\hline \& 2.5 \& 1 \& 0.89 \& 0.89 \& 0.872 \& \& 0.877 \& 0.884 \& 0.892 \& 0.9 \& 0.916 \& \& 0.928 \& 0.945 \& 0.961 \& 0.966 \& 0.97 \& 0.978 \\
\hline \& 2.75 \& 1 \& 0.945 \& \({ }^{0.945}\) \& \({ }^{0.995}\) \& \& \({ }^{0.945}\) \& \({ }^{0.945}\) \& \({ }^{0.945}\) \& \({ }^{0.9945}\) \& \({ }^{0.953}\) \& \& \({ }^{0.962}\) \& \({ }^{0.974}\) \& 0.983 \& \({ }^{0.986}\) \& 0.99 \& 0.995 \\
\hline \& \({ }^{3}\) \& 1 \& \({ }^{0.955}\) \& \({ }^{0.995}\) \& \({ }^{0.956}\) \& \& \({ }^{0.9566}\) \& \({ }^{0.962}\) \& \({ }^{0.967}\) \& \({ }^{0.9971}\) \& 0.979 \& \& 0.985 \& \({ }^{0.995}\) \& \& \& 1 \& \\
\hline \& 3.25
3.5
3 \& 1 \& \({ }^{0.973}\) \& 0.973 \& \({ }^{0.973}\) \& \& \({ }^{0.973}\) \& \({ }^{0.978}\) \& 0.983 \& 0.995 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& 1 \& \\
\hline \& \({ }_{3.75}\) \& 1 \& \& \& 1 \& \& 1 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& 1 \& \\
\hline \& 4 \& \multicolumn{2}{|l|}{\multirow[t]{2}{*}{\(3500 \quad 4000\)}} \& 4500 \& \multirow[t]{2}{*}{5000} \& \multicolumn{2}{|l|}{\multirow[t]{2}{*}{5500}} \& \multirow[t]{2}{*}{6000} \& \multirow[t]{2}{*}{\({ }^{6500}\)} \& 6850 \& \multirow[t]{2}{*}{7000} \& \multicolumn{2}{|l|}{\multirow[t]{2}{*}{7500}} \& \multirow[t]{2}{*}{8000} \& \multirow[t]{2}{*}{8500} \& \multirow[t]{2}{*}{9000} \& \multirow[t]{2}{*}{9500} \& \multirow[t]{2}{*}{10000} \\
\hline \& 1 \& \& \& \({ }^{0.561}\) \& \& \& \& \& \& \({ }_{0} 0.607\) \& \& \& \& \& \& \& \& \\
\hline \& \({ }^{1.25}\) \& 0.665 \& 0.68 \& \({ }^{0} .692\) \& \({ }^{0} .705\) \& \& 0.71 \& 0.715 \& 0.735 \& 0.745 \& 0.745 \& \& 0.753 \& 0.76 \& \({ }^{0.769}\) \& 0.78 \& 0.786 \& \({ }^{0.793}\) \\
\hline \& \({ }^{1.5}\) \& \({ }_{0}^{0.767}\) \& (0.782 \& -0.796 \& -0.807 \& \& 0.818 \& 0.828 \& - \(\begin{aligned} \& 0.837 \\ \& 0.909\end{aligned}\) \& -0.846 \& 0.846
0.945 \& \& 0.854 \& \({ }^{0.863}\) \& 0.8.899 \& \({ }_{0}^{0.874}\) \& 0.879
0.941 \& \({ }^{0.889}\) \\
\hline \& \({ }_{172}^{1.75}\) \& \({ }_{0}^{0.857}\) \& - \(\begin{aligned} \& 0.868 \\ \& 0.928\end{aligned}\) \& \({ }^{0.878}\) \& -0.884 \& \& 0.893 \& \({ }^{0.901}\) \& 0.909 \& \({ }^{0.9913}\) \& \({ }_{0}^{0.995}\) \& \& \({ }^{0.9222}\) \& \({ }^{0.927}\) \& \({ }^{0.935}\) \& -0.937 \& -0.941 \& 0.947
0.986 \\
\hline \& \(\stackrel{2}{2.25}\) \& \({ }_{0}^{0.996}\) \& 0.928
0.968
0. \& 0.935
0.973 \& 0.943
0.977 \& \& 0.949
0.982 \& \({ }_{0}^{0.9957}\) \& - 0.989 \& \({ }_{0}^{0.9965}\) \& \({ }_{0}^{0.9692}\) \& \& \({ }_{0}^{0.972}\) \& \({ }_{0}^{0.975}\) \& \({ }_{1}^{0.977}\) \& 0.982 \& 0.984
1 \& \\
\hline \& 2.5 \& 0.983 \& \({ }_{0}^{0.989}\) \& 0.995 \& 0.995 \& \& \& \& \& \& \& \& \& \& \& 1 \& 1 \& \\
\hline \& 2.75
3 \& \({ }_{1}^{1}\) \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& 1 \& \\
\hline \& \begin{tabular}{l}
3.25 \\
3 \\
\hline
\end{tabular} \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& 1 \& \\
\hline \& 3.5
3.75 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& 1 \& 1 \\
\hline \& 4 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& \& 1 \& \\
\hline \& \& 10500 \& 11000 \& 11500 \& 12000 \& \({ }^{12500}\) \& \& 13000 \& 13500 \& 14000 \& 14500 \& 15000 \& \& 17000 \& 20000 \& Unlimited \& \& \\
\hline \& 1 \& \({ }^{0.656}\) \& \({ }^{0.663}\) \& \({ }^{0.669}\) \& \({ }^{0.674}\) \& \& \({ }^{0.68}\) \& \({ }^{0.685}\) \& 0.69 \& \({ }^{0.696}\) \& 0.7 \& \& \({ }^{0.705}\) \& \({ }^{0.723}\) \& \({ }^{0.746}\) \& 1 \& \& \\
\hline \& 1.25
1.5
1.5 \& 0.8
0.894 \& 0.807
0.896 \& 0.812
0.902 \& 0.818
0.907 \& \& 0.823
0.911 \& 0.829
0.916 \& 0.834
0.92 \& 0.839
0.924 \& 0.844
0.927 \& \& 0.849
0.933 \& 0.867
0.943 \& 0.988
0.958 \& 1 \& \& \\
\hline \& 1.75 \& 0.951 \& 0.954 \& \({ }_{0} 0.958\) \& 0.962 \& \& 0.966 \& 0.968 \& 0.971 \& 0.973 \& 0.978 \& \& 0.98 \& 0.988 \& 1 \& 1 \& \& \\
\hline \& 2 \& 0.99 \& 0.992 \& 0.995 \& 0.995 \& \& 1 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& \& \\
\hline \& 2.25 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& \& \\
\hline \& 2.5

2 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& \& <br>
\hline \& 2.75 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& \& <br>
\hline \& 3.25 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& \& <br>
\hline \& ${ }^{3.5}$ \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& 1 \& \& 1 \& 1 \& 1 \& 1 \& \& <br>
\hline \& 3.75 \& 1 \& , \& 1 \& , \& \& , \& 1 \& \& , \& 1 \& \& , \& 1 \& 1 \& 1 \& \& <br>
\hline \& \& \& \& \& \& \& \& \& \& \& 1 \& \& \& \& \& 1 \& \& <br>
\hline
\end{tabular}

CHANGE
Depends on variety of plan benefits


## Medical Base Claims

| Current | Major Service Categories (dollars PMPM) |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Inpatient (IP) | Outpatient (OP) | Primary Care Physician (PCP) | Emergency <br> Room (ER) | Specialty Care Physician (SCP) | Other | Preventive Care |
| Experience-Rated In-Network | 126.99 | 172.32 | 19.5 | 32.17 | 84.1 | 10.93 | 21.58 |
| Experience-Rated Out-of-Network | 184.13 | 249.87 | 28.28 | 46.65 | 121.95 | 15.85 | 31.29 |


| Proposed | Major Service Categories (dollars PMPM) |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Inpatient (IP) | Outpatient (OP) | Primary Care Physician (PCP) | Emergency <br> Room (ER) | Specialty Care Physician (SCP) | Other | Preventive Care |
| Experience-Rated In-Network | \$128.18 | \$156.66 | \$14.92 | \$29.36 | \$62.75 | \$6.68 | \$18.45 |
| Experience-Rated Out-of-Network | \$2.48 | \$6.52 | \$1.23 | \$0.08 | \$4.68 | \$0.64 | \$0.37 |


| Change | Major Service Categories (dollars PMPM) |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Inpatient (IP) | Outpatient (OP) | Primary Care Physician (PCP) | Emergency <br> Room (ER) | Specialty Care Physician (SCP) | Other | Preventive Care |
| Experience-Rated In-Network | 0.9\% | -9.1\% | -23.5\% | -8.7\% | -25.4\% | -38.9\% | -14.5\% |
| Experience-Rated Out-of-Network | -98.7\% | -97.4\% | -95.7\% | -99.8\% | -96.2\% | -96.0\% | -98.8\% |


|  | ${ }_{-28}^{\text {IP }}$ |  |  |  | ${ }_{\substack{\text { E. } \\ 0.31}}^{\text {and }}$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | (1.23 |  |  |  |  |
|  |  |  | Indemnty (N) | Indemity (al ohera reas) |  |  |
| ${ }_{B}^{A}$ |  | ${ }_{\substack{0.0 \\ 6.0 .72}}^{0.7}$ | ${ }^{\text {. }} 0.32$ | 0.02 |  |  |
| ${ }^{\text {Applicable ms }}$ |  | 0.62 .772 | ${ }^{0.74}$ | Othe agreasate costs hare |  |  |
|  |  |  |  |  |  |  |



CURRENT

| Deductible Mutipipier | Deductible | ${ }^{\text {Avg. Family Size: } 2}$ | Avg. Family Size: 3 | Avg. Family Size: 4 |
| :---: | :---: | :---: | :---: | :---: |
| 1 | 0 | 1 | 1 | 1 |
| 1 | 50 | 0.635 | 0.441 | 0.352 |
| 1 | 100 | 0.63 | 0.437 | 0.335 |
| 1 | 150 | 0.633 | 0.437 | 0.334 |
| 1 | 200 | 0.633 | 0.439 | 0.335 |
| 1 | 300 | 0.635 | 0.441 | 0.338 |
| 1 | 400 | 0.639 | 0.444 | 0.339 |
| 1 | 500 | 0.644 | 0.447 | 0.342 |
| 1 | 750 | 0.657 | 0.459 | 0.349 |
| 1 | 1000 | 0.663 | 0.47 | 0.358 |
| 1 | 1500 | 0.688 | 0.489 | 0.369 |
| 1 | 2000 | 0.708 | 0.508 | 0.389 |
| 1 | 2250 | 0.714 | 0.518 | 0.396 |
| 1 | 2500 | 0.719 | 0.528 | 0.404 |
| 1 | 3000 | 0.731 | 0.54 | 0.421 |
| 1 | 3500 | 0.744 | 0.552 | 0.431 |
| 1 | 4000 | 0.754 | 0.565 | 0.441 |
| 1 | 4500 | 0.762 | 0.577 | 0.452 |
| 1 | 5000 | 0.772 | 0.588 | 0.463 |
| 1 | 5500 | 0.78 | 0.597 | 0.474 |
| 1 | 6000 | 0.787 | 0.608 | 0.884 |
| 1 | 6500 | 0.795 | 0.616 | 0.492 |
| 1 | 6850 | 0.8 | 0.625 | 0.502 |
| 1 | 7000 | 0.807 | 0.632 | 0.511 |
|  | 7500 | 0.807 | 0.632 | 0.511 |
| 1 | 8000 | 0.813 | 0.641 | 0.519 |
| 1 | 8500 | 0.818 | 0.648 | 0.527 |
| 1 | 9000 | 0.824 | 0.656 | 0.535 |
| 1 | 9500 | 0.828 | 0.66 | 0.545 |
| 1 | 10000 | 0.829 | 0.666 | 0.549 |
| 1 | 10500 | 0.833 | 0.674 | 0.559 |
| 1 | 11000 | 0.838 | 0.681 | 0.566 |
| 1 | 11500 | 0.843 | 0.69 | 0.572 |
| 1 | 12000 | 0.846 | 0.69 | 0.579 |
| 1 | 12500 | 0.851 | 0.7 | 0.584 |
| , | ${ }^{13000}$ | 0.854 | 0.706 | 0.59 |
| 1 | ${ }^{13500}$ | 0.857 | 0.712 | 0.596 |
|  | 14000 | 0.861 | 0.718 | 0.602 |
| 1 | 14500 | 0.864 | 0.723 | 0.607 |
|  | 15000 | 0.867 | 0.727 | 0.613 |
| 1 | 17000 | 0.879 | 0.744 | 0.634 |
| 1 | 20000 | ${ }^{0.896}$ | ${ }^{0.767}$ | 0.661 |


| Deductible | Avg. Family Size: 2 | Avg. Family Size: 3 | Avg. Family Size: 4 | Avg. Family Size: 5 |
| :---: | :---: | :---: | :---: | :---: |
| 0 | 1 | 1 | 1 | 1 |
| 50 | 0.635 | 0.441 | 0.352 | 0.352 |
| 100 | 0.63 | 0.437 | 0.335 | 0.335 |
| 150 | 0.633 | 0.437 | 0.334 | 0.334 |
| 200 | 0.633 | 0.439 | 0.335 | 0.335 |
| 300 | 0.635 | 0.441 | 0.338 | 0.338 |
| 400 | 0.639 | 0.444 | 0.339 | 0.339 |
| 500 | 0.644 | 0.447 | 0.342 | 0.342 |
| 750 | 0.657 | 0.459 | 0.349 | 0.349 |
| 1000 | 0.663 | 0.47 | 0.358 | 0.358 |
| 1500 | 0.688 | 0.489 | 0.369 | 0.369 |
| 2000 | 0.708 | 0.508 | 0.389 | 0.389 |
| 2250 | 0.714 | 0.518 | 0.396 | 0.396 |
| 2500 | 0.719 | 0.528 | 0.404 | 0.404 |
| 3000 | 0.731 | 0.54 | 0.421 | 0.421 |
| 3500 | 0.744 | 0.552 | 0.431 | 0.431 |
| 4000 | 0.754 | 0.565 | 0.441 | 0.441 |
| 4500 | 0.762 | 0.577 | 0.452 | 0.452 |
| 5000 | 0.772 | 0.588 | 0.463 | 0.463 |
| 5500 | 0.78 | 0.597 | 0.474 | 0.474 |
| 6000 | 0.787 | 0.608 | 0.484 | 0.484 |
| 6500 | 0.795 | 0.616 | 0.492 | 0.492 |
| 6850 | 0.8 | 0.625 | 0.502 | 0.502 |
| 7000 | 0.807 | 0.632 | 0.511 | 0.511 |
| 7500 | 0.807 | 0.632 | 0.511 | 0.511 |
| 8000 | 0.813 | 0.641 | 0.519 | 0.519 |
| 8500 | 0.818 | 0.648 | 0.527 | 0.527 |
| 9000 | 0.824 | 0.656 | 0.535 | 0.535 |
| 9500 | 0.828 | 0.66 | 0.545 | 0.545 |
| 10000 | 0.829 | 0.666 | 0.549 | 0.549 |
| 10500 | 0.833 | 0.674 | 0.559 | 0.559 |
| 11000 | 0.838 | 0.681 | 0.566 | 0.566 |
| 11500 | 0.843 | 0.69 | 0.572 | 0.572 |
| 12000 | 0.846 | 0.69 | 0.579 | 0.579 |
| 12500 | 0.851 | 0.7 | 0.584 | 0.584 |
| 13000 | 0.854 | 0.706 | 0.59 | 0.59 |
| 13500 | 0.857 | 0.712 | 0.596 | 0.596 |
| 14000 | 0.861 | 0.718 | 0.602 | 0.602 |
| 14500 | 0.864 | 0.723 | 0.607 | 0.607 |
| 15000 | 0.867 | 0.727 | 0.613 | 0.613 |
| 17000 | 0.879 | 0.744 | 0.634 | 0.634 |
| 20000 | 0.896 | 0.767 | 0.661 | 0.661 |



CURRENT


| Oop max. | Avg. Family Size: 2 | Avg. Family Size: 3 | Avg. Family Size: 4 | Avg. Family Size: 5 |
| :---: | :---: | :---: | :---: | :---: |
| 500 | 0.675 | 0.498 | 0.382 | 0.382 |
| 1000 | 0.675 | 0.498 | 0.382 | 0.382 |
| 1500 | 0.675 | 0.498 | 0.382 | 0.382 |
| 2000 | 0.7 | 0.52 | 0.404 | 0.404 |
| 2500 | 0.725 | 0.542 | 0.424 | 0.424 |
| 3000 | 0.767 | 0.588 | 0.444 | 0.444 |
| 4000 | 0.778 | 0.609 | 0.464 | 0.464 |
| 5000 | 0.784 | 0.612 | 0.484 | 0.484 |
| 5500 | 0.79 | 0.615 | 0.504 | 0.504 |
| 6000 | 0.801 | 0.623 | 0.524 | 0.524 |
| 6500 | 0.806 | 0.628 | 0.524 | 0.524 |
| 7000 | 0.811 | 0.632 | 0.524 | 0.524 |
| 8000 | 0.818 | 0.632 | 0.524 | 0.524 |
| 9000 | 0.824 | 0.632 | 0.524 | 0.524 |
| 10000 | 0.828 | 0.637 | 0.527 | 0.527 |
| 11000 | 0.836 | 0.644 | 0.537 | 0.537 |
| 12000 | 0.836 | 0.647 | 0.541 | 0.541 |
| 13000 | 0.852 | 0.657 | 0.553 | 0.553 |
| 14000 | 0.868 | 0.662 | 0.564 | 0.564 |
| 15000 | 0.89 | 0.672 | 0.572 | 0.572 |
| 16000 | 0.893 | 0.69 | 0.581 | 0.581 |
| 17000 | 0.914 | 0.7 | 0.595 | 0.595 |
| 18000 | 0.928 | 0.711 | 0.601 | 0.601 |
| 19000 | 0.931 | 0.716 | 0.608 | 0.608 |
| 20000 | 0.95 | 0.726 | 0.616 | 0.616 |
| 25000 | 1 | 0.785 | 0.649 | 0.649 |
| 30000 | 1 | 0.819 | 0.69 | 0.69 |
| 35000 | 1 | 0.945 | 0.875 | 0.875 |
| 40000 | 1 | 0.973 | 0.905 | 0.905 |
| 45000 | 1 | 1 | 0.931 | 0.931 |
| 50000 | 1 | 1 | 0.962 | 0.962 |
| Unlimited | 1 | 1 | 1 | 1 |



## Community Rate Loads

Current Factors

| Cigna Pathwell <br> Specialty | N/A |
| :--- | :---: |

## Proposed Factors

| Cigna Pathwell <br> Specialty - Min | 0.97 |
| :--- | :---: |
| Cigna Pathwell <br> Specialty - Max | 1.01 |

Change in Factors
Cigna Pathwell
Specialty

| Current Factors |  |  |
| :---: | :---: | :---: |
| Diagnostic Indicators | may be used toperform additional riskassessment of the |  |
|  | 0.95 | Minimum |
|  | 1.05 | Maximum |

Proposed Factors

| Diagnostic Indicators | Diagnostic Indicators may be used to |  |
| :---: | :---: | :---: |
|  | N/A | Minimum |
|  | N/a | Maximum |

## Change <br> Removing this

factor

## Current Factors



Change
Removing
this factor
Current Factors


## Change

Removing this factor




| Rider | Methodology |
| :---: | :---: |
| Infertility Treatment - Buy Up \#2 | $\begin{aligned} & \text { Base Cost PMPM }=3.1311 \times\left[\frac{\mathrm{Max}}{57896.14}\right] \\ & 5.27728 \text { cap on coverage } \end{aligned}$ |
| Embarc Benefit Protection | N/A |
| Hearing Aids <br> Varicose Veins | $\frac{1.002}{1.002}$ |



## Mental Health and Substance Use Disorder Rates

MHSUD Trend and Adjustments

|  | Current | Proposed | Change |
| :--- | :---: | :---: | :---: |
| MH/SUD Trend | $6.00 \%$ | $6.00 \%$ | $0.0 \%$ |
| FFS Adjustment (if applicable) | $1.50 \%$ | $1.50 \%$ | $0.0 \%$ |

OAP/PPO/LCP Rates [VT-specific]

|  | Proclaim |  | Facets |  |
| :--- | ---: | ---: | ---: | ---: |
|  | Minimum | Maximum | Minimum | Maximum |
| Current Rates | $\$ 15.06$ | $\$ 26.79$ | $\$ 2.66$ | $\$ 14.25$ |
| Proposed Rates | $\$ 21.89$ | $\$ 38.67$ | $\$ 8.62$ | $\$ 23.55$ |
| Change | $45 \%$ | $44 \%$ | $224 \%$ | $65 \%$ |

NWK Rates [VT-specific]

|  |  |  |  |  |  |  |  |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |



|  | Copay |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Change | 0 | 5 | 10 | 15 | 20 | 25 | 30 | 35 | 40 | 45 | 50 |
| Mental Health | 25.9\% | 25.9\% | 25.9\% | 25.9\% | 25.9\% | 25.9\% | 25.9\% | 25.9\% | 25.9\% | 25.9\% | 25.9\% |
| Substance Abuse | 26.0\% | 25.9\% | 26.0\% | 26.0\% | 25.9\% | 26.0\% | 25.9\% | 26.0\% | 25.9\% | 26.0\% | 25.8\% |
| Mental Health and Substance Abuse | 25.9\% | 25.9\% | 25.9\% | 25.9\% | 25.9\% | 25.9\% | 25.9\% | 25.9\% | 25.9\% | 25.9\% | 25.9\% |
| Non-standard (copay N/A) | 25.9\% |  |  |  |  |  |  |  |  |  |  |



Vision

Vision - Frequency Factors

|  | Current |  | Proposed |  | Change |  |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: |
| Service | $\mathbf{1 2}$ month | $\mathbf{2 4}$ month | $\mathbf{1 2}$ month | $\mathbf{2 4}$ month | $\mathbf{1 2}$ month | $\mathbf{2 4}$ month |
| Exam (Exam Only Plans) | 1 | 0.7 | 1 | 0.7 | $0.0 \%$ | $0.0 \%$ |
| Exam (Comprehensive Plans) | 1 | 0.635 | 1 | 0.635 | $0.0 \%$ | $0.0 \%$ |
| Lenses: Single Vision | 1 | 0.78 | 1 | 0.78 | $0.0 \%$ | $0.0 \%$ |
| Lenses: Bifocal | 1 | 0.78 | 1 | 0.78 | $0.0 \%$ | $0.0 \%$ |
| Lenses: Trifocal | 1 | 0.78 | 1 | 0.78 | $0.0 \%$ | $0.0 \%$ |
| Lenses: Lenticular | 1 | 0.78 | 1 | 0.78 | $0.0 \%$ | $0.0 \%$ |
| Lenses: Progressive | 1 | 0.78 | 1 | 0.78 | $0.0 \%$ | $0.0 \%$ |
| Frames | 1 | 0.78 | 1 | 0.78 | $0.0 \%$ | $0.0 \%$ |
| Contact Lenses: Elective | 1 | 0.67 | 1 | 0.67 | $0.0 \%$ | $0.0 \%$ |
| Contact Lenses: Therapeutic | 1 | 0.67 | 1 | 0.67 | $0.0 \%$ | $0.0 \%$ |
| Materials | 1 | 0.67 | 1 | 0.78 | $0.0 \%$ | $16.4 \%$ |





Pharmacy Trend

| Pharmacy Trend |  |  |  | Current |  |  |  | Proposed |  |  |  |  | Change |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| co |  | Formulary | Drug Type | 2019/2018 | 2020/2019 | 2021/2020 | 2022+12021 | 2019/2018 | 202012019 | 2021/2020 | 2022/2021 | 2023+/2022 | 2019/2018 | 2020/2019 | 2021/2020 | $2022 / 2021$ | $2023+12022$ |
| Cost Trend | Legacy | Legacy | Generic | 5.20\% | 5.20\% | 5.20\% | 5.20\% | 5.09\% | 6.24\% | 3.45\% | 8.07\% | 5.30\% | -0.11\% | 1.04\% | -1.75\% | 2.87\% |  |
|  | Legacy |  | Brand | 10.70\% | 9.20\% | 9.20\% | 9.20\% | 10.62\% | 7.93\% | 5.11\% | 3.25\% | 13.51\% | -0.08\% | -1.27\% | -4.09\% | -5.95\% |  |
|  | Legacy |  | Specialty | 8.30\% | 20.10\% | 20.10\% | 20.10\% | 7.74\% | 30.68\% | 9.48\% | 7.74\% | 8.71\% | -0.56\% | 10.58\% | -10.62\% | -12.36\% |  |
|  | Standard | Standard | Generic | 3.40\% | 2.90\% | 2.90\% | 2.90\% | 3.15\% | 5.35\% | 1.73\% | 2.96\% | 3.77\% | -0.25\% | 2.45\% | -1.17\% | 0.06\% |  |
|  | Standard |  | Brand | 12.00\% | 11.80\% | 11.80\% | 11.80\% | 12.38\% | 7.17\% | 6.01\% | 11.05\% | 13.90\% | 0.38\% | -4.63\% | -5.79\% | -0.75\% |  |
|  | Standard |  | Specialty | 8.30\% | 20.10\% | 20.10\% | 20.10\% | 7.75\% | 30.71\% | 9.50\% | 7.76\% | 8.73\% | -0.55\% | 10.61\% | -10.60\% | -12.34\% |  |
|  | Value | Value | Generic | 5.20\% | 5.20\% | 5.20\% | 5.20\% | 5.09\% | 6.24\% | 3.45\% | 8.07\% | 5.30\% | -0.11\% | 1.04\% | -1.75\% | 2.87\% |  |
|  | Value |  | Brand | 10.70\% | 9.20\% | 9.20\% | 9.20\% | 10.62\% | 7.93\% | 5.11\% | 3.25\% | 13.51\% | -0.08\% | -1.27\% | -4.09\% | -5.95\% |  |
|  | Value |  | Specialty | 8.30\% | 20.10\% | 20.10\% | 20.10\% | 7.74\% | 30.68\% | 9.48\% | 7.74\% | 8.71\% | -0.56\% | 10.58\% | -10.62\% | -12.36\% |  |
|  | ValueDRT | ValueDRT | Generic | 4.10\% | 3.80\% | 3.80\% | 3.80\% | 4.13\% | 5.39\% | 2.54\% | 2.96\% | 3.77\% | 0.03\% | 1.59\% | -1.26\% | -0.84\% |  |
|  | ValueDRT |  | Brand | 9.60\% | 7.80\% | 7.80\% | 7.80\% | 9.61\% | 7.07\% | 4.18\% | 11.05\% | 13.90\% | 0.01\% | -0.73\% | -3.62\% | 3.25\% |  |
|  | ValueDRT |  | Specialty | 8.30\% | 20.10\% | 20.10\% | 20.10\% | 7.76\% | 30.71\% | 9.50\% | 7.76\% | 8.73\% | -0.54\% | 10.61\% | -10.60\% | -12.34\% |  |
|  | Advantage | Advantage | Generic | 5.20\% | 5.20\% | 5.20\% | 5.20\% | 5.09\% | 6.24\% | 3.45\% | 8.07\% | 5.30\% | -0.11\% | 1.04\% | -1.75\% | 2.87\% |  |
|  | Advantage |  | Brand | 10.70\% | 9.20\% | 9.20\% | 9.20\% | 10.62\% | 7.93\% | 5.11\% | 3.25\% | 13.51\% | -0.08\% | -1.27\% | -4.09\% | -5.95\% |  |
|  | Advantage |  | Specialty | 8.30\% | 20.10\% | 20.10\% | 20.10\% | 7.74\% | 30.68\% | 9.48\% | 7.74\% | 8.71\% | -0.56\% | 10.58\% | -10.62\% | -12.36\% |  |
|  | AdvantageDRT | AdvantageD RT | Generic | 4.10\% | 3.80\% | 3.80\% | 3.80\% | 4.13\% | 5.39\% | 2.54\% | 2.96\% | 3.77\% | 0.03\% | 1.59\% | -1.26\% | -0.84\% |  |
|  | AdvantageDRT |  | Brand | 9.60\% | 7.80\% | 7.80\% | 7.80\% | 9.61\% | 7.07\% | 4.18\% | 11.05\% | 13.90\% | 0.01\% | -0.73\% | -3.62\% | 3.25\% |  |
|  | AdvantageDRT |  | Specialty | 8.30\% | 20.10\% | 20.10\% | 20.10\% | 7.76\% | 30.71\% | 9.50\% | 7.76\% | 8.73\% | -0.54\% | 10.61\% | -10.60\% | -12.34\% |  |
|  | Performance | Performance | Generic | 3.40\% | 2.90\% | 2.90\% | 2.90\% | 3.15\% | 5.35\% | 1.73\% | 2.96\% | 3.77\% | -0.25\% | 2.45\% | -1.17\% | 0.06\% |  |
|  | Performance |  | Brand | 12.00\% | 11.80\% | 11.80\% | 11.80\% | 12.38\% | 7.17\% | 6.01\% | 11.05\% | 13.90\% | 0.38\% | -4.63\% | -5.79\% | -0.75\% |  |
|  | Performance |  | Specialty | 8.30\% | 20.10\% | 20.10\% | 20.10\% | 7.75\% | 30.71\% | 9.50\% | 7.76\% | 8.73\% | -0.55\% | 10.61\% | -10.60\% | -12.34\% |  |
|  | Performance 4Tier | Performance_4Tier | Generic | 3.40\% | 2.90\% | 2.90\% | 2.90\% | 3.15\% | 5.35\% | 1.73\% | 2.96\% | 3.77\% | -0.25\% | 2.45\% | -1.17\% | 0.06\% |  |
|  | Performance 4Tier |  | Brand | 12.00\% | 11.80\% | 11.80\% | 11.80\% | 12.38\% | 7.17\% | 6.01\% | 11.05\% | 13.90\% | 0.38\% | -4.63\% | -5.79\% | -0.75\% |  |
|  | Performance 4Tier |  | Specialty | 8.30\% | 20.10\% | 20.10\% | 20.10\% | 7.75\% | 30.71\% | 9.50\% | 7.76\% | 8.73\% | -0.55\% | 10.61\% | -10.60\% | -12.34\% |  |
|  | Generics Only | Generics Only | Generic | 5.20\% | 5.20\% | 5.20\% | 5.20\% | 5.09\% | 6.24\% | 3.45\% | 8.07\% | 5.30\% | -0.11\% | 1.04\% | -1.75\% | 2.87\% |  |
|  | Generics Only |  | Brand | 10.70\% | 9.20\% | 9.20\% | 9.20\% | 10.62\% | 7.93\% | 5.11\% | 3.25\% | 13.51\% | -0.08\% | -1.27\% | -4.09\% | -5.95\% |  |
|  | Generics Only |  | Specialty | 8.30\% | 20.10\% | 20.10\% | 20.10\% | 7.74\% | 30.68\% | 9.48\% | 7.74\% | 8.71\% | -0.56\% | 10.58\% | -10.62\% | -12.36\% |  |
|  | Advantage 4Tier | Advantage_4 Tier | Generic | 5.20\% | 5.20\% | 5.20\% | 5.20\% | 5.09\% | 6.24\% | 3.45\% | 8.07\% | 5.30\% | -0.11\% | 1.04\% | -1.75\% | 2.87\% |  |
|  | Advantage 4Tier |  | Brand | 10.70\% | 9.20\% | 9.20\% | 9.20\% | 10.62\% | 7.93\% | 5.11\% | 3.25\% | 13.51\% | -0.08\% | -1.27\% | -4.09\% | -5.95\% |  |
|  | Advantage 4Tier |  | Specialty | 8.30\% | 20.10\% | 20.10\% | 20.10\% | 7.74\% | 30.68\% | 9.48\% | 7.74\% | 8.71\% | -0.56\% | 10.58\% | -10.62\% | -12.36\% |  |
| Utilization Trend | Legacy | Legacy | Generic | 2.70\% | 2.10\% | 2.10\% | 2.10\% | 3.58\% | 1.00\% | 2.80\% | 0.16\% | 0.16\% | 0.88\% | -1.10\% | 0.70\% | -1.94\% |  |
|  | Legacy |  | Brand | -9.10\% | -7.90\% | -7.90\% | -7.90\% | -8.37\% | 5.05\% | 10.30\% | -2.18\% | 2.60\% | 0.73\% | 12.95\% | 18.20\% | 5.72\% |  |
|  | Legacy |  | Specialty | 10.00\% | -5.60\% | -5.60\% | -5.60\% | 7.80\% | -9.33\% | 6.51\% | 5.42\% | 5.55\% | -2.20\% | -3.73\% | 12.11\% | 11.02\% |  |
|  | Standard | Standard | Generic | 2.70\% | 2.10\% | 2.10\% | 2.10\% | 3.52\% | 0.92\% | 2.67\% | 0.01\% | 0.63\% | 0.82\% | -1.18\% | 0.57\% | -2.09\% |  |
|  | Standard |  | Brand | -11.00\% | -10.10\% | -10.10\% | -10.10\% | -10.23\% | 2.95\% | 8.26\% | -4.27\% | -6.34\% | 0.77\% | 13.05\% | 18.36\% | 5.83\% |  |
|  | Standard |  | Specialty | 10.00\% | -5.60\% | -5.60\% | -5.60\% | 7.80\% | -9.33\% | 6.51\% | 5.42\% | 5.55\% | -2.20\% | -3.73\% | 12.11\% | 11.02\% |  |
|  | Value | Value | Generic | 2.70\% | 2.10\% | 2.10\% | 2.10\% | 3.58\% | 1.00\% | 2.80\% | 0.16\% | 0.16\% | 0.88\% | -1.10\% | 0.70\% | -1.94\% |  |
|  | Value |  | Brand | -9.10\% | -7.90\% | -7.90\% | -7.90\% | -8.37\% | 5.05\% | 10.30\% | -2.18\% | -2.60\% | 0.73\% | 12.95\% | 18.20\% | 5.72\% |  |
|  | Value |  | Specialty | 10.00\% | -5.60\% | -5.60\% | -5.60\% | 7.80\% | -9.33\% | 6.51\% | 5.42\% | 5.55\% | -2.20\% | -3.73\% | 12.11\% | 11.02\% |  |
|  | ValueDRT | ValueDRT | Generic | 2.20\% | 1.70\% | 1.70\% | 1.70\% | 3.21\% | 0.65\% | 2.43\% | 0.01\% | 0.63\% | 1.01\% | -1.05\% | 0.73\% | -1.69\% |  |
|  | ValueDRT |  | Brand | -13.20\% | -12.30\% | -12.30\% | -12.30\% | -12.38\% | 2.85\% | 8.47\% | -4.27\% | -6.34\% | 0.82\% | 15.15\% | 20.77\% | 8.03\% |  |
|  | ValueDRT |  | Specialty | 10.00\% | -5.60\% | -5.60\% | -5.60\% | 7.80\% | -9.33\% | 6.51\% | 5.42\% | 5.55\% | -2.20\% | -3.73\% | 12.11\% | 11.02\% |  |
|  | Advantage | Advantage | Generic | 2.70\% | 2.10\% | 2.10\% | 2.10\% | 3.58\% | 1.00\% | 2.80\% | 0.16\% | 0.16\% | 0.88\% | -1.10\% | 0.70\% | -1.94\% |  |
|  | Advantage |  | Brand | -9.10\% | -7.90\% | -7.90\% | -7.90\% | -8.37\% | 5.05\% | 10.30\% | -2.18\% | -2.60\% | 0.73\% | 12.95\% | 18.20\% | 5.72\% |  |
|  | Advantage |  | Specialty | 10.00\% | -5.60\% | -5.60\% | -5.60\% | 7.80\% | -9.33\% | 6.51\% | 5.42\% | 5.55\% | -2.20\% | -3.73\% | 12.11\% | 11.02\% |  |
|  | AdvantageDRT | $\underset{\text { RT }}{\text { AdvantageD }}$ | Generic | 2.20\% | 1.70\% | 1.70\% | 1.70\% | 3.21\% | 0.65\% | 2.43\% | 0.01\% | 0.63\% | 1.01\% | -1.05\% | 0.73\% | -1.69\% |  |
|  | AdvantageDRT |  | Brand | -13.20\% | -12.30\% | -12.30\% | -12.30\% | -12.38\% | 2.85\% | 8.47\% | -4.27\% | -6.34\% | 0.82\% | 15.15\% | 20.77\% | 8.03\% |  |
|  | AdvantageDRT |  | Specialty | 10.00\% | -5.60\% | -5.60\% | -5.60\% | 7.80\% | -9.33\% | 6.51\% | 5.42\% | 5.55\% | -2.20\% | -3.73\% | 12.11\% | 11.02\% |  |
|  | Performance | Performance | Generic | 2.70\% | 2.10\% | 2.10\% | 2.10\% | 3.52\% | 0.92\% | 2.67\% | 0.01\% | 0.63\% | 0.82\% | -1.18\% | 0.57\% | -2.09\% |  |
|  | Performance |  | Brand | -11.00\% | -10.10\% | -10.10\% | -10.10\% | -10.23\% | 2.95\% | 8.26\% | -4.27\% | -6.34\% | 0.77\% | 13.05\% | 18.36\% | 5.83\% |  |
|  | Performance |  | Specialty | 10.00\% | -5.60\% | -5.60\% | -5.60\% | 7.80\% | -9.33\% | 6.51\% | 5.42\% | 5.55\% | -2.20\% | -3.73\% | 12.11\% | 11.02\% |  |
|  | Performance 4Tier | $\begin{gathered} \text { Performance } \\ \quad 4 \text { Tier } \end{gathered}$ | Generic | 2.70\% | 2.10\% | 2.10\% | 2.10\% | 3.52\% | 0.92\% | 2.67\% | 0.01\% | 0.63\% | 0.82\% | -1.18\% | 0.57\% | -2.09\% |  |
|  | Performance 4Tier |  | Brand | -11.00\% | -10.10\% | -10.10\% | -10.10\% | -10.23\% | 2.95\% | 8.26\% | -4.27\% | -6.34\% | 0.77\% | 13.05\% | 18.36\% | 5.83\% |  |
|  | Performance 4Tier |  | Specialty | 10.00\% | -5.60\% | -5.60\% | -5.60\% | 7.80\% | -9.33\% | 6.51\% | 5.42\% | 5.55\% | -2.20\% | -3.73\% | 12.11\% | 11.02\% |  |
|  | Generics Only | Generics Only | Generic | 2.70\% | 2.10\% | 2.10\% | 2.10\% | 3.58\% | 1.00\% | 2.80\% | 0.16\% | 0.16\% | 0.88\% | -1.10\% | 0.70\% | -1.94\% |  |
|  | Generics Only |  | Brand | -9.10\% | -7.90\% | -7.90\% | -7.90\% | -8.37\% | 5.05\% | 10.30\% | -2.18\% | -2.60\% | 0.73\% | 12.95\% | 18.20\% | 5.72\% |  |
|  | Generics Only Advantage 4Tier Advantage 4Tier Advantage 4Tier |  | Specialty | 10.00\% | -5.60\% | -5.60\% | -5.60\% | 7.80\% | -9.33\% | 6.51\% | 5.42\% | 5.55\% | -2.20\% | -3.73\% | 12.11\% | 11.02\% |  |
|  |  | Advantage_4 Tier | Generic | 2.70\% | 2.10\% | 2.10\% | 2.10\% | 3.58\% | 1.00\% | 2.80\% | 0.16\% | 0.16\% | 0.88\% | -1.10\% | 0.70\% | -1.94\% |  |
|  |  |  | Brand | -9.10\% | -7.90\% | -7.90\% | -7.90\% | -8.37\% | 5.05\% | 10.30\% | -2.18\% | -2.60\% | 0.73\% | 12.95\% | 18.20\% | 5.72\% |  |
|  |  |  | Specialty | 10.00\% | -5.60\% | -5.60\% | -5.60\% | 7.80\% | -9.33\% | 6.51\% | 5.42\% | 5.55\% | -2.20\% | -3.73\% | 12.11\% | 11.02\% |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |

## Rx Area Factors

|  | State | Minimum <br> Area <br> Factor | Maximum <br> Area <br> Factor |
| :--- | :--- | ---: | ---: |
| Current | VT | 0.76 | 0.76 |
| Proposed | VT | 0.86 | 0.86 |
| Change |  | $13.2 \%$ | $13.2 \%$ |


Pharmacy: CPD (Cost per Script)



Proposed Factors

| Industry | Minimum | Maximum | Median |
| :--- | :---: | :---: | :---: |
| Agriculture | 0.925 | 1.075 | 1 |
| Mining | 0.95 | 1.125 | 1.075 |
| Construction | 0.9 | 1.125 | 1 |
| Manufacturing | 0.825 | 1.075 | 0.95 |
| Transportation, Communication, \& Utilitites | 0.8 | 1.1 | 1 |
| Wholesale Trade | 0.875 | 1.05 | 0.9375 |
| Retail Trade | 0.925 | 1.1 | 1.025 |
| Finance, Insurance and Real Estate | 0.9 | 1.05 | 0.975 |
| Services | 0.85 | 1.125 | 1.025 |
| Public Administration | 0.9 | 1.05 | 0.975 |




Current Factors

| Area Description | Rating Area | Product | Adjustment |
| :--- | :--- | :--- | ---: |
| VT, VERMONT | VTNWK1 | NWK | 0 |
| VT, VERMONT | VTOAP1 | OAP | 0 |
| VT, VERMONT | VTPPO1 | PPO | 0 |

Proposed Factors

| Area Description | Rating Area | Product | Adjustment |
| :--- | :--- | :--- | :---: |
| $V T$, VERMONT | VTNWK1 | NWK | N/A |
| $V T$, VERMONT | VTOAP1 | OAP | N/A |
| $V T$, VERMONT | VTPPO1 | PPO | N/A |

Changes
Removing these factors

## EXHIBIT I

## ACTUARIAL MEMORANDUM AND CERTIFICATION

## Scope and Purpose

The purpose of this filing is to submit CIGNA Health and Life Insurance Company's group manual rating methodology. Our pricing model was developed to provide a consistent rating methodology across products. This filing includes Open Access Plus, PPO, Network, Indemnity, and retiree medical insurance product, and is applicable for groups of 101 or more lives. Methodology is also included for Pharmacy products.

## Benefit Description

The benefits covered in this memorandum include group health insurance coverage as described in CIGNA Health and Life Insurance Company forms HP-POL et al, and HC-TOC et al.

## Census

$\overline{\text { Member level census will be used when available. If only subscriber level data is available, penetration and }}$ translation assumptions will be used to create a member level census for manual rate development. The penetration and translation assumptions used are developed from studies of our book of business, which includes experience from similar CIGNA Health and Life Insurance Company ("CHLIC") polic ies.
Penetration estimates the number of subscribers that will select the CIGNA Health and Life Insurance Company plan; the translation process develops projected subscribers and members within rating tiers.

## Adjustments to Base Claims

The base claim rates by area are adjusted for certain group and member characteristics. These include industry loads and discounts, age and sex demographic adjustments, and trends.

Adjustments for industry (SIC) are developed from a study of our book of business combined with results from an outside consultant's national industry factor assessment study.

Age and sex demographic adjustments are developed from a study of our book of business. The resulting age/sex slopes are normalized to represent the national census.

Trends reflect historical experience from CHLIC's group medical experience and projections for future levels. Medical trend rates are applied on a daily basis.

## Benefit Plan Adjustments

Base claims are reduced for specific cost sharing features of the product and benefit plan selected. Copay and other cost sharing benefit design related adjustments are made using assumptions regarding utilization levels by base claim component. Claim distributions are used to determine the impact of deductibles, coinsurance and out of pocket maximums. In addition, a utilization dampening factor is applied to reflect lower utilization levels as cost sharing rises.

## Renewability Clause

The benefit plans covered under this memorandum are guaranteed renewable.
Applicability
CHLIC, Inc. antic ipates both renew als and new issues from the forms currently filed.
Marketing Method
These products are sold to employer-employee groups, labor union groups and association groups through CIGNA Health and Life Insurance Company group sales offices.

## Premium Classes

Premium rates may vary by product, plan design, geographic area, group demographics, industry, effective date, experience, and underwriting discretion.

## Issue Age Range

There are no issue age restrictions in our policy forms; however, eligibility requirements must be fulfilled.

## Premium Modalization Rules

The CIGNA Health and Life Insurance Company Health Manual produces monthly premiums. Modalization factors are expressed as a function of these monthly rates as follows:

| Annual | 11.8227 |
| :--- | :--- |
| Semi-Annual | 5.9557 |
| Qum | 2.9852 |

## Distribution of Business

Rates vary by geographic location and group specific characteristics, including demographics. Target distribution is to groups with both single employees and employees with dependents, assuming a 40/60 distribution

## Rating

The group rates filed represent the rate level we expect to be necessary to achieve a desired average loss ratio for all group contracts. Accordingly, actual rates for groups will vary as a result of a variety of factors. These include variation in benefit plan, age, gender, family composition, size, industry, area, healthplan claim experience, pharmacy indicators and underwriting discretion.

Depending upon group size, case specific claim experience may be used to adjust the rate. Credibility is based on group size, pooling level and months of experience. Rates for partially credible groups are based on a blend of experience and manual rating.

For Minimum Premium plans, the premium paid by the policyholder is reduced for the portion of the total claim amount that is expected to be self-insured.

## Anticipated Loss Ratio

The methodology and supporting factors apply to groups of 101 or more employees.
The anticipated large group loss ratio for this policy is $87.9 \%$.
The components of Cigna's retention for our Large Group pricing are as follows:

| Retention Components | \% of Premium |
| :--- | :---: |
| Admin | $5.0 \%$ |
| Access Fee | $0.8 \%$ |
| Quality Improvement | $0.2 \%$ |
| Tax | $2.0 \%$ |
| State Assessments | $2.0 \%$ |
| PPACA Fees* | $0.0 \%$ |
| Risk Charge | $0.0 \%$ |
| Profit | $2.0 \%$ |
| Commissions | $0.0 \%$ |
| Total Retention | $\mathbf{1 2 . 1 \%}$ |

* PPACA fees are primarily associated with the Health Insurance Industry Fee (HIIF), which is assumed to be $2.5 \%$ for 2020 calendar months, and $0 \%$ for $2021+$ calendar months due to recent legislative changes. The remainder is for the PCORI, which is currently a small amount ( $<0.1 \%$ ), and assumed to continue for 2020 and beyond.


## Comparison to Status Quo

This filing includes a number of changes to our medical and pharmacy rating methodologies. It is difficult to quantify each change independent of the others. The average expected annual increase in manual rates in Vermont is $7.6 \%$. This figure was calculated by comparing the current filed and approved manuals using an illustrative effective date of $1 / 1 / 2022$ to the proposed $1 / 1 / 2023$ manuals for a representative sample of Vermont sitused business.

| Category | Detail | Avg | Min | Max |
| :--- | :--- | :---: | :---: | :---: |
| Filed and Approved <br> Claims Trend | Filed and Approved Claims Trend | $6.8 \%$ | $6.8 \%$ | $6.8 \%$ |
| Revisions to <br> Pricing Factors | Changes to trend, area factors, and methodology <br> since approved 1/1/2020 filing | $0.5 \%$ | $-26.7 \%$ | $22.5 \%$ |
| Expense Changes | MLR change since our last approved filing <br> $(88.2 \% ~->~ 87.9 \%) ~$ | $0.3 \%$ | $0.3 \%$ | $0.3 \%$ |
| Requested <br> Rate Change | =[(1+trend)*(1+factor changes) <br> $*(1+$ expense changes) $]-1$ | $7.6 \%$ | $-21.5 \%$ | $31.3 \%$ |

## Changes to Methodology for the 2022 Cigna Rate Filing Compared to 2020 Approved Rate Filing

- Medical
- Updates to utilization dampening methodology and data
- Updates to non-par methodology and data
- Updates to the medical area factors and trend
- Updates to Network Utilization methodology and factors
- Updates to claim adjustments using a proprietary predictive model
- Updates to Cigna Pathwell factors
- Updates to Industry factors
- Update to remove multiple offering load and enhanced non-par factors
- Updates to medical and riders
- Updates to Standard Industrial Classific ation (SIC) factors
- Updates to the medical capitation percentages
- Updates to community rate loads
- Updates to the POS Load coefficients
- Behavioral
- Updates to the MHSUD trend and rates
- Vision
- Updates to the vision cost
- Updates to service utilization
- Pharmacy
- Updates to average wholesale price per script
- Updates to average script count per customer
- Updates to script channel assumptions
- Updates to pharmacy cost trend
- Updates to pharmacy utilization trend
- Updates to pharmacy area factors
- Updates to pharmacy additional benefits adjustments
- Updates to pharmacy industry load
- Updates to pharmacy discounts


## ACTUARIAL CERTIFICATION

## Opinion

In my opinion, the rates were developed using reasonable actuarial assumptions, and the rate levels are reasonable in relationship to the benefits provided. The actuarial data and experience will be maintained by the company and available for review by the Green Mountain Care Board upon request.

I certify that to the best of my knowledge and judgment, this rate filing is in compliance with the applicable laws and regulations of the State. In summary, I believe that the rating assumptions proposed will produce rates which are not excessive, inadequate, or unfairly discriminatory


Daniel Acton, FSA, MAAA
Actuarial Senior Director
Date: 10/03/2022

