

State: Rhode Island **Filing Company:** Blue Cross & Blue Shield of Rhode Island
TOI/Sub-TOI: MS08G Group Medicare Supplement - Standard Plans 2010/MS08G.012 Multi-Plan 2010
Product Name: Plan 65 Group
Project Name/Number: 2021 Plan 65 Group Rating Factors/PL65GRP2021-2022

Filing at a Glance

Company: Blue Cross & Blue Shield of Rhode Island
 Product Name: Plan 65 Group
 State: Rhode Island
 TOI: MS08G Group Medicare Supplement - Standard Plans 2010
 Sub-TOI: MS08G.012 Multi-Plan 2010
 Filing Type: Rate
 Date Submitted: 03/18/2021
 SERFF Tr Num: BCBS-132767407
 SERFF Status: Assigned
 State Tr Num:
 State Status: Open-Pending Actuary Review
 Co Tr Num: PL65GRP2021-2022
 Effective: 07/01/2021
 Date Requested:
 Author(s): Jessie Knowles, Donna Goliger, Tim Savoie, Adam Barkley, Michael Bodenrader, Tori DeCotis, Seth Lawlor, Erin McCarthy, Dan Cash, Konrad Lech
 Reviewer(s): John Garrett (primary), Bela Gorman, Charles DeWeese, Victor Woods, Jennifer Smagula, Courtney Miner, Alyssa Metivier
 Disposition Date:
 Disposition Status:
 Effective Date:
 State Filing Description:

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General Information

Project Name: 2021 Plan 65 Group Rating Factors	Status of Filing in Domicile: Not Filed
Project Number: PL65GRP2021-2022	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 and Large
Group Market Type: Employer, Association	Overall Rate Impact: 4.8%
Filing Status Changed: 03/19/2021	
State Status Changed: 03/19/2021	Deemer Date:
Created By: Jessie Knowles	Submitted By: Jessie Knowles
Corresponding Filing Tracking Number: BCBS-126755351	

Filing Description:

Rating Factors Applicable to Plan 65 Group Rates Effective July 2021 - June 2022.

Company and Contact

Filing Contact Information

Jessie Knowles, Actuarial Analyst	Jessie.Knowles@BCBSRI.ORG
500 Exchange Street	401-459-1000 [Phone] 5382 [Ext]
Providence, RI 02903	

Filing Company Information

Blue Cross & Blue Shield of Rhode Island	CoCode: 53473	State of Domicile: Rhode Island
500 Exchange Street	Group Code:	Company Type: Health Insurance
Providence, RI 02903	Group Name:	State ID Number:
(401) 459-1000 ext. [Phone]	FEIN Number: 05-0158952	

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Filing Fees

State Fees

Fee Required? Yes
Fee Amount: \$75.00
Retaliatory? No
Fee Explanation: \$25 per plan, 3 plans
Per Company: Yes

Company	Amount	Date Processed	Transaction #
Blue Cross & Blue Shield of Rhode Island	\$75.00	03/18/2021 04:21 PM	196906201
EFT Total	\$75.00		

SERFF Tracking #:

BCBS-132767407

State Tracking #:

Company Tracking #:

PL65GRP2021-2022

State: Rhode Island

Filing Company:

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Rate Information

Rate data applies to filing.

Filing Method: Review and Approve

Rate Change Type: Increase

Overall Percentage of Last Rate Revision: 4.400%

Effective Date of Last Rate Revision: 07/01/2020

Filing Method of Last Filing: Review and Approve

SERFF Tracking Number of Last Filing: BCBS-132262922

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
Blue Cross & Blue Shield of Rhode Island	4.800%	4.800%	\$892,600	7,450	\$18,655,800	11.400%	0.400%

SERFF Tracking #:

BCBS-132767407

State Tracking #:**Company Tracking #:**

PL65GRP2021-2022

State:

Rhode Island

Filing Company:

Blue Cross & Blue Shield of Rhode Island

TOI/Sub-TOI:

MS08G Group Medicare Supplement - Standard Plans 2010/MS08G.012 Multi-Plan 2010

Product Name:

Plan 65 Group

Project Name/Number:

2021 Plan 65 Group Rating Factors/PL65GRP2021-2022

Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		Consumer Narrative		New		Group P65 Consumer Narrative 2021.pdf,
2		Filing Letter and Factors		New		Group Plan 65 Filing Letter 2021.pdf,

Consumer Disclosure – Group Plan 65

Blue Cross & Blue Shield of Rhode Island (“BCBSRI”) has submitted its annual rate filing for Group Medicare Supplement plans. This document gives an overview of that filing.

Scope and Range of the Rate Change:

BCBSRI has proposed rate increases for Group Medicare Supplement plans for Rhode Island members. These rate changes, once approved, will apply to about 7,450 members. The new monthly premium rates will apply to members upon the group’s renewal, beginning July 1, 2021.

The average rate change for these plans is expected to be 4.8%. The range of rate changes groups will experience is expected to be 0.4% to 11.4%.

The actual change experienced by a group and its employees may vary based upon updated members’ claims experience in this market.

Key Drivers for this Filing:

The proposed rate change is mainly due to the continuing increase in the total cost of health care in Rhode Island.

Healthcare expenses are driven by:

- how often and how much health care is received (utilization); and
- year to year changes in Medicare deductibles and copayments.

Increases in the cost of medical services continue to drive the increase in overall healthcare expenses. Increasing utilization is also a part of the increase in healthcare expenses. The number of medical services our members receive continues to grow year over year.

Medicare deductibles and copayments that are covered under these plans are expected to increase as well. Administrative costs factor into this filing, as do premium taxes paid to the State of Rhode Island.

BCBSRI recognizes that providing affordable healthcare coverage is very important to our members. We continue to work to improve internal operations to moderate both medical and administrative expense trends. And we are teaming up with our healthcare delivery system partners to develop and implement new ways to transform our business.



500 Exchange Street, Providence, Rhode Island 02903-2699
(401) 459-1000 bcbsri.com

March 18, 2021

Office of the Health Insurance Commissioner
1511 Pontiac Avenue, Bldg. 69-1
Cranston, RI 02920

Subject: Rating factors applicable to Plan 65 group plans with effective dates of July 1, 2021 through June 30, 2022

Dear Commissioner Tigue:

This letter and the attached exhibits comprise a filing by Blue Cross & Blue Shield of Rhode Island (BCBSRI) of rating factors for Plan 65 group plans with effective dates of July 1, 2021 through June 30, 2022.

Based on current membership, approximately 7,450 members will be affected by this filing.

This filing represents an expected average increase of 4.8% for the Plan 65 medical and rider rates with effective dates of July 2021 through June 2022. This average rate change is an estimate utilizing the latest available claims experience base. Actual rates will be determined using updated claims experience, and thus the resulting average rate change is not guaranteed. The expected loss ratio is 81.5%.

Exhibit I displays the filed annual incurred claims projection factors for calendar years 2020-2023 by benefit for all of the Basic Benefits. Exhibit II displays the comparable annual incurred claims projection factors for the Skilled Nursing Facility (SNF), Major Medical, Prescription Drug, and Vision riders. The price assumptions for the projection of incurred claims expense for Basic Benefits and the SNF rider have been developed utilizing the latest information published by CMS and actuarial assumptions where final published numbers are not available. As with our individual Plan 65 filing, because of the impact of COVID-19 on claims after February 2020, the utilization/mix projection factors for Basic Benefits and the SNF rider have been developed utilizing a hybrid approach to determine the appropriate trends. Our experience reflects a small decline in SNF utilization and, using actuarial judgment, we projected no additional utilization change. For the Basic Benefits, we used actuarial judgment to estimate that CY 2021 utilization will be the same as CY 2019 and projected forward from CY 2021 in a manner similar to our standard methodology.

The projection factors for Major Medical and Prescription Drug riders are consistent with the analogous large group and small group projection factors (weighted 65/35).

Exhibits I and II display the administrative expense per contract per month values to be utilized for Plan 65 group rates and riders effective in CY 2021, CY 2022, and CY 2023.

We request approval in this filing for a reserve contribution factor at 3.25% of premium, consistent with the current approved rating factors in this segment, as displayed in Exhibits I and II.

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Exhibits I and II both display the Tax Liability Factor of 2.00% for prospective premium accounts. This factor reflects the state premium tax assessment, which is currently 2.00% of premium, per R.I. General Laws § 44-17-1.

Finally, Exhibits I and II display an investment income credit factor of -0.08% of premium to be utilized for the rating of Plan 65 group plans.

In accordance with the filing fee requirements contained in Rhode Island General Laws section 42-14-18, a fee of \$75 has been included with this submission via electronic funds transfer (EFT). The policy form pertaining to this filing is Grp Plan 65 (01/20).

We respectfully ask for your early consideration and approval of the proposed rating factors. Approval by April 15, 2021 would be greatly appreciated to ensure adequate lead-time to accommodate the notification of Plan 65 group rates effective in the third quarter of 2021.

Sincerely,

DocuSigned by:

Konrad Lech

3/18/2021

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Konrad Lech, ASA, MAAA

Sr. Actuary

cc: Ms. Monica Auciello, Esquire

Commissioner Tighe

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Exhibit I**BLUE CROSS & BLUE SHIELD OF RHODE ISLAND****PLAN 65 – BASIC BENEFITS****Group Plan 65 Basic Benefit Rating Factors for Group Prospective Rates
For Plan Years with Effective Dates of July 1, 2021 through June 30, 2022**

	(1)	(2)	(3)	(4)	(5)	(6)
	<u>CY 2020</u>	<u>CY 2021</u>	<u>CY 2022</u>	<u>CY 2023</u>	<u>Factor</u>	<u>Application</u>
Annual Incurred Claims Projection Factor ^(A)						
Part A Deductible	0.9544	1.1399	1.0350	1.0313		X
Part A Copayments/365 Add'l Days	1.0323	1.0540	1.0350	1.0313		X
Part B Deductible	1.0703	1.0253	1.0443	1.0613		X
Part B Physician Coinsurance	0.8805	1.1323	1.0354	1.0348		X
Part B Outpatient Coinsurance	0.8623	1.2303	1.0930	1.0898		X
Basic Benefits	0.9087	1.1417	1.0503	1.0511		X
Benefit Adjustment Factor ^(B)						
Group Plan C w/o SNF					1.0000	X
Group Plan G w/o SNF					0.8745	X
Group Plan N w/o SNF					0.7167	X
Administrative Expense PCPM ^(C)						
Group Plan C, G, and N w/o SNF		\$24.70	\$26.65	\$27.22		+
Reserve Factor					3.25%	
Tax Liability Factor ^(D)					2.00%	
Investment Income Credit					-0.08%	
Total Variable Retention Factor ^(E)					0.9483	/

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- (A) Provides for changes in Medicare benefits, provider fees, utilization/mix, or pure premium. The Basic Benefits factor represents a weighted average of all benefit categories for basic coverage.
- (B) For each plan, the projected claims expense is multiplied by the appropriate Benefit Adjustment Factor. The Benefit Adjustment Factors reflect cost sharing and utilization differences from the base experience. They were developed using BCBSRI experience and data from Milliman's Health Cost Guidelines.
- (C) Based on Administrative Expense per Contract per Month (PCPM) derived from Administrative Expense Budgets for anticipated expenses as estimated at the time of rate calculation and applied to projected membership for the three filed plan types.
- (D) Tax Liability Factor for prospective premium accounts includes the 2.00% state premium tax liability. In the event that Rhode Island or the federal government enacts increases to taxes and/or assessments, BCBSRI reserves the right to modify the Tax Liability Factor component to fund such increases going forward.
- (E) Total Variable Retention Factor is 1 minus the sum of the Reserve Factor plus the Tax Liability Factor plus the Investment Income Credit. The Required Premium is the sum of the Projected Experience Claims PCPM plus the Administrative Expense PCPM, that quantity divided by the Total Variable Retention Factor.

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Exhibit II**BLUE CROSS & BLUE SHIELD OF RHODE ISLAND****PLAN 65 – RIDERS****Group Plan 65 Rider Rating Factors for Group Prospective Rates
For Plan Years with Effective Dates of July 1, 2021 through June 30, 2022**

	(1)	(2)	(3)	(4)	(5)	(6)
	<u>CY 2020</u>	<u>CY 2021</u>	<u>CY 2022</u>	<u>CY 2023</u>	<u>Factor</u>	<u>Application</u>
Annual Incurred Claims Projection Factor ^(A)						
Skilled Nursing Facility Benefits	1.0271	1.0540	1.0350	1.0313		X
Major Medical/Pharmacy Benefits	1.0836	1.0836	1.0836	1.0836		X
Vision Benefits	1.0000	1.0000	1.0000	1.0000		X
Administrative Expense PCPM ^(B)						
Skilled Nursing Facility Benefits		\$2.05	\$2.18	\$2.19		+
Major Medical/Pharmacy Benefits		\$49.49	\$55.08	\$58.00		+
Vision Benefits		\$0.29	\$0.30	\$0.29		+
Reserve Factor					3.25%	
Tax Liability Factor ^(C)					2.00%	
Investment Income Credit					-0.08%	
Total Variable Retention Factor ^(D)					0.9483	/

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- (A) Provides for changes in Medicare benefits, provider fees, price, utilization/mix, or other expected changes in pure premium.
- (B) Based on Administrative Expense per Contract per Month (PCPM) derived from Administrative Expense Budgets for anticipated expenses as estimated at the time of rate calculation.
- (C) Tax Liability Factor for prospective premium accounts includes 2.00% state premium tax liability. In the event that Rhode Island or the federal government enacts increases to taxes and/or assessments, BCBSRI reserves the right to modify the Tax Liability Factor component to fund such increases going forward.
- (D) Total Variable Retention Factor is 1 minus the sum of the Reserve Factor plus the Tax Liability Factor plus the Investment Income Credit. The Required Premium is the sum of the Projected Experience Claims PCPM plus the Administrative Expense PCPM, that quantity divided by the Total Variable Retention Factor.

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Supporting Document Schedules

Bypassed - Item:	A&H Experience
Bypass Reason:	See attached filing letter and enclosures.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Actuarial Certification - Life & A&H
Bypass Reason:	Not Required
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Actuarial Memorandum - A&H Rate Revision Filing
Bypass Reason:	See attached filing letter and enclosures.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	*Medicare Supplement-Group
Bypass Reason:	See attached filing letter and enclosures
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Premium Rate Sheets - Life & A&H
Bypass Reason:	See attached filing letter and enclosures.
Attachment(s):	
Item Status:	
Status Date:	