

**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:** 2024 Plan 65 Group Rating Factors/PL65GRP2024-2025

## 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: 01/31/2024  
SERFF Tr Num: BCBS-133973470  
SERFF Status: Assigned  
State Tr Num:  
State Status: Open-Assigned To Analyst  
Co Tr Num: PL65GRP2024-2025  
Effective: 07/01/2024  
Date Requested:  
Author(s): Jessie Knowles, Michael Bodenrader, Konrad Lech, Stuart Carter, Chris Eynatian  
Reviewer(s): Courtney Miner (primary), Alyssa Metivier, Victor Woods, Cheryl DelPico  
Disposition Date:  
Disposition Status:  
Effective Date:  
State Filing Description:

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## General Information

Project Name: 2024 Plan 65 Group Rating Factors	Status of Filing in Domicile: Not Filed
Project Number: PL65GRP2024-2025	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: 13.3%
Filing Status Changed: 01/31/2024	
State Status Changed: 01/31/2024	Deemer Date:
Created By: Jessie Knowles	Submitted By: Jessie Knowles
Corresponding Filing Tracking Number:	

### Filing Description:

Rating Factors Applicable to Plan 65 Group Rates Effective July 2025 - June 2026.

## 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	01/31/2024 02:29 PM	278135418
<b>EFT Total</b>	<b>\$75.00</b>		

SERFF Tracking #:

BCBS-133973470

State Tracking #:

Company Tracking #:

PL65GRP2024-2025

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

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2024 Plan 65 Group Rating Factors/PL65GRP2024-2025

## Rate Information

Rate data applies to filing.

Filing Method:

Review and Approve

Rate Change Type:

Increase

Overall Percentage of Last Rate Revision:

5.100%

Effective Date of Last Rate Revision:

07/01/2023

Filing Method of Last Filing:

Review and Approve

SERFF Tracking Number of Last Filing:

BCBS-133525521

## 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	13.300%	13.300%	\$2,305,000	6,370	\$17,391,700	17.900%	9.000%

SERFF Tracking #:

BCBS-133973470

State Tracking #:

Company Tracking #:

PL65GRP2024-2025

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

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2024 Plan 65 Group Rating Factors/PL65GRP2024-2025

## Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		Filing Letter and Factors		New		Group_Filing_Letter_2024.pdf,
2		Consumer Narrative		New		Group P65 Consumer Narrative 2024.pdf,

January 31, 2023

Mr. Cory King  
Acting Commissioner  
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, 2024 through June 30, 2025

Dear Mr. King:

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, 2024 through June 30, 2025.

Based on current membership, approximately 6,370 members will be affected by this filing.

This filing represents an expected average increase of 13.3% for the Plan 65 medical and rider rates with effective dates of July 2023 through June 2024. This average rate change is an estimate utilizing currently available claims experience. Actual rates may reflect updated claims experience, and thus the resulting average rate change is not guaranteed. The expected loss ratio is 81.7%.

For all Basic Benefits and the Skilled Nursing Facility (SNF) rider, the claims experience base used to calculate the average increase for this filing is January 2022 through December 2022. For Major Medical and Prescription Drug riders, the claims experience base used to calculate the average increase for this filing is August 2020 through July 2021. The experience for these riders is becoming too volatile with membership currently under 300 and continuing to decline. Thus, we are trending forward our previous base claims.

Exhibit I displays the filed annual incurred claims projection factors for calendar years 2023-2026 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.

In this filing we are estimating a 0.0% physician price trend for 2024. Although currently, the Medicare Physician Fee Schedule calls for a decrease that would result in a -1.25% trend, we believe it is likely that Congress will pass “doc fix” legislation to override the fee schedule decrease. If it becomes clear, prior to March 15, 2024, that Congress will not override the fee schedule decrease, we will amend this filing with a revised trend accordingly.

Other 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. Utilization/mix selections are the same as those in our individual Plan 65 filing.

Mr. King  
January 31, 2024  
Page 2

The projection factors for Major Medical and Prescription Drug riders are consistent with the analogous group projection factors.

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 2024, CY 2025, and CY 2026.

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.

Exhibits I and II both display the Tax Liability Factor of 2.00%. 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 -0.58% 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 (01/24).

We respectfully ask for your early consideration and approval of the proposed rating factors.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Eynatian', with a stylized flourish at the end.

Christopher Eynatian, FSA, MAAA  
Director, Medicare Actuarial Services

cc: Ms. Monica Auciello, Esquire

**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, 2024 through June 30, 2025**

	(1)	(2)	(3)	(4)	(5)	(6)
	<u>CY 2023</u>	<u>CY 2024</u>	<u>CY 2025</u>	<u>CY 2026</u>	<u>Factor</u>	<u>Application</u>
Annual Incurred Claims Projection Factor <sup>(A)</sup>						
Part A Deductible	1.0951	1.0200	1.0368	1.0355		X
Part A Copayments/365 Add'l Days	1.0283	1.0200	1.0368	1.0355		X
Part B Deductible	0.9700	1.0619	1.0708	1.0661		X
Part B Physician Coinsurance	1.0638	1.0489	1.0527	1.0582		X
Part B Outpatient Coinsurance	1.1320	1.1016	1.1070	1.1058		X
<b>Basic Benefits</b>	<b>1.0736</b>	<b>1.0605</b>	<b>1.0679</b>	<b>1.0699</b>		<b>X</b>
Benefit Adjustment Factor <sup>(B)</sup>						
Group Plan C w/o SNF					1.0000	X
Group Plan G w/o SNF					0.8546	X
Group Plan N w/o SNF					0.6958	X
Administrative Expense PCPM <sup>(C)</sup>						
Group Plan C, G, and N w/o SNF		\$29.61	\$31.65	\$33.15		+
Reserve Factor					3.25%	
Tax Liability Factor <sup>(D)</sup>					2.00%	
Investment Income Credit					-0.58%	
Total Variable Retention Factor <sup>(E)</sup>					0.9533	/



- (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 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.

**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, 2024 through June 30, 2025**

	(1) <u>CY 2023</u>	(2) <u>CY 2024</u>	(3) <u>CY 2025</u>	(4) <u>CY 2026</u>	(5) <u>Factor</u>	(6) <u>Application</u>
Annual Incurred Claims Projection Factor <sup>(A)</sup>						
Skilled Nursing Facility Benefits	1.1301	1.0200	1.0368	1.0355		X
Major Medical/Pharmacy Benefits	1.0836	1.0917	1.0917	1.0917		X
Vision Benefits	1.0000	1.0000	1.0000	1.0000		X
Administrative Expense PCPM <sup>(B)</sup>						
Skilled Nursing Facility Benefits		\$3.33	\$3.46	\$3.50		+
Major Medical/Pharmacy Benefits		\$58.43	\$63.84	\$68.23		+
Vision Benefits		\$0.27	\$0.27	\$0.27		+
Reserve Factor					3.25%	
Tax Liability Factor <sup>(C)</sup>					2.00%	
Investment Income Credit					-0.58%	
Total Variable Retention Factor <sup>(D)</sup>					0.9533	/

- (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 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.

## 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 6,370 members. The new monthly premium rates will apply to members upon the group’s renewal, beginning July 1, 2024.

The average rate change for these plans is expected to be 13.3%. The range of rate changes groups will experience is expected to be 9.0% to 17.9%.

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.

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**Filing Company:** Blue Cross & Blue Shield of Rhode Island

## Supporting Document Schedules

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

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

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

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

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

<b>Satisfied - Item:</b>	Response to OHIC Questions from 2-10-2022
<b>Comments:</b>	
<b>Attachment(s):</b>	Response to OHIC Questions from 2-10-2022.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

**SERFF Tracking #:**

BCBS-133973470

**State Tracking #:**

**Company Tracking #:**

PL65GRP2024-2025

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**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:**

2024 Plan 65 Group Rating Factors/PL65GRP2024-2025

1. **Question:** In past years you provided a trend and comparison supplement as a response to a question I asked. It would be helpful if you could provide an update to that page.

**Answer:** The following table illustrates the latest trend factors that were filed and approved for Group Plan 65, and the actual Plan 65 group claims PMPM (per member per month) trends for calendar year 2021. The actual trend is based on completed data with one month of runout. Plan 65 claims complete more slowly than other market segments due to the secondary nature of the benefit, and this can add some volatility to the estimated actual trend.

Note that the actual trend estimate for 2021 includes recent information that was not reflected in the filing.

<b>Category</b>	<b>2021/2020</b>	<b>2022/2021</b>	<b>2023/2022</b>
Part A Deductible	1.1399	1.0350	1.0313
Part A Copay/365 Add'l Days	1.0540	1.0350	1.0313
Part B Deductible	1.0253	1.0443	1.0613
Physician Copay	1.1323	1.0354	1.0348
Outpatient Copay	1.2303	1.0930	1.0898
<i>Basic Benefits Total</i>	<i>1.1417</i>	<i>1.0503</i>	<i>1.0511</i>
<i>Skilled Nursing Facility</i>	<i>1.0540</i>	<i>1.0350</i>	<i>1.0313</i>
<b>Rating Trend<sup>(1)</sup></b>	<b>1.1399</b>	<b>1.0500</b>	<b>1.0507</b>
<b>Estimated Actual Trend<sup>(2)</sup></b>	<b>1.0851</b>	<b>N/A</b>	<b>N/A</b>

(1) *Basic Benefits and skilled nursing facility trends weighted by group Plan 65 claims.*

(2) *Actual claims PMPM trend for group Plan 65 with runout through January 2022, estimated complete.*

2. **Question:** In past years you provided me an exhibit illustrating the administrative expense calculation for Basic Benefits and SNF Benefits. It would be helpful to have an update for that exhibit.

**Answer:** The following table has been updated:

**Illustration of Plan 65 Operating Expense (OE) Allocation  
between Basic Benefit and SNF Riders**

	January - July 2021 Contract Months	2022 PMPM	2023 PMPM	2024 PMPM

Projected SNF Claims	9,761	\$15.96	\$15.75	\$16.24
<u>Projected Basic Benefit Claims</u>	<u>48,215</u>	<u>\$150.57</u>	<u>\$155.94</u>	<u>\$163.82</u>
Weighted Average Plan 65 Claims	48,215	\$166.53	\$171.69	\$180.06
Required OE		\$26.93	\$30.83	\$29.29
OE as Percentage of Claims		17.5 %	19.4%	17.5%
<b>Allocated SNF Admin</b>		<b>\$2.79</b>	<b>\$3.05</b>	<b>\$2.85</b>
<b>Allocated Basic Benefit Admin</b>		<b>\$26.36</b>	<b>\$30.21</b>	<b>\$28.71</b>
<b>Collected OE Revenue PMPM</b>		<b>\$26.93</b>	<b>\$30.83</b>	<b>\$29.29</b>

While reviewing our response to this question, we found an error in the admin costs in our filing. CY 2023 and CY 2024 were transposed. Fixing this error, would reduce our expected rate increase from 2.6% to 2.1%. The exhibit above reflects administrative expense as filed.

3. **Question:** Can you explain the increase in the administrative expense for Plans C, G and N w/o SNF and also for Major Medical/Pharmacy Rider benefits as compared to last year?

**Answer:** The PMPM increase is mainly due to a decrease in projected enrollment.

**Projected Enrollment  
for Admin**

<u>Year</u>	<u>Last Filing</u>	<u>Year</u>	<u>This Filing</u>	<u>Change</u>
2021	301,587	2022	273,950	-9.2%
2022	306,727	2023	258,518	-15.7%
2023	307,152	2024	250,192	-18.5%

4. **Question:** Can you provide an experience analysis, perhaps on an actual-to-expected basis, that would help explain how the application of health care cost increase factors is expected to result in the proposed rate actions? This is also an explanation you provided last year.

**Answer:** The below table shows the rating assumptions utilized for total group Plan 65 claims expenses by year for this filing versus the previous filing.

CY 2021 experience was favorable to filing by 4.1%.

The 2022 trend in the current filing reflects a trend about 0.5% lower than a normal expected annual increase in claims of about 5.0% (as displayed in our rating assumption, CY 2023 to CY 2024).

The combined impact of the favorable CY 2021 actuals and trends to CY 2022 is about 4.6% favorable, which subtracts from a normal expected annual increase in claims of about 5.0%. This is consistent with



the 2.8% expected increase in base benefit including SNF, particularly once the increase in admin is considered.

<b><u>July 2021</u></b>	<b><u>CY 2021</u></b>	
<b><u>Submission</u></b>	<b><u>(Projected)</u></b>	
<b>Total</b>	<b>\$153.53</b>	
<b><u>July 2022</u></b>	<b><u>CY 2021</u></b>	<b><u>CY 2022</u></b>
<b><u>Submission</u></b>	<b><u>(Completed)</u></b>	<b><u>(Projected)</u></b>
<b>Total</b>	<b>\$147.24</b>	<b>\$153.80</b>
<i>Projected Trend</i>	<i>0.959</i>	<i>1.045</i>

5. **Question:** I understand that there are approximately 7,450 individuals covered by BCBSRI under Group Med Supp. How many groups are there?

**Answer:** As of December 2021, there were 129 fully insured groups.

6. **Question:** I understand that groups of 500 or more lives are rated on their own experience. How many such groups do you have.

**Answer:** As of December 2021, there were 2 fully insured groups of 500 or more lives.

7. **Question:** Please provide some supporting documentation for your 95% seasonality adjustment to the January through July 2021 experience. Is the base period claims expense shown in columns 1 and 2 of Schedule 9 and column 1 of schedule 11 the actual January through July experience, and the projected claims expense that experience divided by the actual contract months for the same period, all multiplied by seasonality and projection factors?

**Answer:** The seasonality factor was calculated based on historical Plan 65 paid claim patterns from years 2018 and 2019, as shown in the exhibit below. The seasonality pattern calculated through this analysis is comparable to how 2021 seasonality materialized. The same calculation based on the January through December 2021 experience period data that recently became available results in a seasonality factor of 95.7%.

		<b>Paid Claims PMPM</b>	
	<b>Month</b>	<b>2018</b>	<b>2019</b>
	January	\$222.91	\$235.65
	February	\$161.53	\$165.45
	March	\$159.76	\$166.17
	April	\$149.84	\$172.76

	May	\$158.04	\$164.62
	June	\$147.40	\$153.41
	July	\$147.05	\$157.36
	August	\$157.77	\$148.44
	September	\$137.64	\$146.42
	October	\$157.79	\$162.53
	November	\$144.53	\$143.40
	<u>December</u>	\$140.46	\$144.73
A	Full Year	\$157.02	\$163.32
B	January-July	\$163.79	\$173.59
C = A / B	Seasonality Factor	95.9%	94.1%
	Average Seasonality Factor	95.0%	

8. **Question:** It is understandable that you would not want to use the 2020 experience, but how would it be different if you had used it? That is, how does it compare to 2019 or to the January to July 2021 period chosen?

**Answer:** 2020 experience was greatly impacted by restrictions in the early phases of the COVID-19 pandemic. 2020 paid claims PMPM were 9.7% lower when compared to the seasonality adjusted January through July 2021 paid claims. With August through December 2021 experience now available (replacing the 95% seasonality factor), 2020 paid claims PMPM are 10.2% lower than 2021 paid claims PMPM.