

State: Arkansas **Filing Company:** UnitedHealthcare of Arkansas, Inc.
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004E Small Group Only
 - Other
Product Name: AR SG HMO 2024.01.01
Project Name/Number: /

Filing at a Glance

Company: UnitedHealthcare of Arkansas, Inc.
Product Name: AR SG HMO 2024.01.01
State: Arkansas
TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)
Sub-TOI: HOrg02G.004E Small Group Only - Other
Filing Type: Rate
Date Submitted: 06/13/2023
SERFF Tr Num: UHLC-133707659
SERFF Status: Closed-Approved
State Tr Num: ACA OFF EXCHANGE ONLY
State Status: Approved-Closed
Co Tr Num:

Effective 01/01/2024
Date Requested:
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Reviewer(s): Donna Lambert (primary), Johnny Flippo, David Dillon
Disposition Date: 08/11/2023
Disposition Status: Approved
Effective Date: 01/01/2024

State Filing Description:

Rate Filing Justification Part II (Plain Language Summary)

Pursuant to 45 CFR 154.215, health insurance issuers are required to file Rate Filing Justifications. Part II of the Rate Filing Justification for rate increases and new submissions must contain a written description that includes a simple and brief narrative describing the data and assumptions that were used to develop the proposed rates. The Part II template below must be filled out and uploaded as an Adobe PDF file under the Consumer Disclosure Form section of the Supporting Documentation tab.

Name of Company UnitedHealthcare Plan of Arkansas

SERFF tracking number UHLC-133707659

Submission Date 06-13-2023

Product Name HMO, POS

Market Type Individual Small Group

Rate Filing Type Rate Increase New Filing

Scope and Range of the Increase:

The 5.44% increase is requested because:

It is anticipated to be sufficient to cover the projected benefit and administrative costs for the 2024 plan year.

This filing will impact:

of Arkansas policyholder's 278 # of Arkansas covered lives 2731

The average, minimum and maximum rate changes increases are:

- Average Rate Change: The average premium change, by percentage, across all policy holders if the filing is approved 5.44 %
- Minimum Rate Change: The smallest premium increase (or largest decrease), by percentage, that any one policy holder would experience if the filing is approved 3.30 %
- Maximum Rate Change: The largest premium increase, by percentage, that any one policy holder would experience if the filing is approved 13.5 %

Individuals within the group may vary from the aggregate of the above increase components as a result of:

Plan-level premiums having been adjusted on our renewing plans.

Financial Experience of Product

The overall financial experience of the product includes:

Actual claims data from January 2022 - December 2022.

The rate increase will affect the projected financial experience of the product by:

Lining up our premium rates with the expected revenue needed.

Components of Increase

The request is made up of the following components:

Trend Increases – 8.26 % of the 5.44 % total filed increase

1. Medical Utilization Changes – Defined as the increase in total plan claim costs not attributable to changes in the unit cost of underlying services, or renegotiation of provider contracts. Examples include changes in the mix of services utilized, or an increase/decrease in the frequency of service utilization.

This component is 4.70 % of the 5.44 % total filed increase.

2. Medical Price Changes – Defined as the increase in total plan claim costs attributable to changes in the unit cost of underlying services, or renegotiation of provider contracts.

This component is 3.40 % of the 5.44 % total filed increase.

Other Increases – -2.8 % of the 5.44 % total filed increase

1. Medical Benefit Changes Required by Law – Defined as any new mandated plan benefit changes, as mandated by either State or Federal Regulation.

This component is 0.0 % of the 5.44 % total filed increase.

2. Medical Benefit Changes Not Required by Law – Defined as changes in plan benefit design made by the company, which are not required by either State or Federal Regulation.

This component is 0.0 % of the 5.44 % total filed increase.

3. Changes to Administration Costs – Defined as increases in the costs of providing insurance coverage. Examples include claims payment expenses, distribution costs, taxes, and general business expenses such as rent, salaries, and overhead.

This component is 0.86 % of the 5.44 % total filed increase.

4. Changes to Profit Margin – Defined as increases to company surplus or changes as an additional margin to cover the risk of the company.

This component is -3.6 % of the 5.44 % total filed increase.

5. Other – Defined as:

This includes other rate impacts such as risk adjustments, migration impact, credibility adjustments, projected experience adjustments, and projected catastrophic claim adjustments.

This component is -.04 % of the 5.44 % total filed increase.

**Federal Rate Filing Justification Part III
Actuarial Memorandum and Certification**

UnitedHealthcare of Arkansas, Inc.

NAIC: 95446

FEIN: 63-1036819

State of Arkansas Rate Review

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Section 1: Purpose

The following is a rate filing prepared by UnitedHealthcare of Arkansas, Inc.. This filing has been prepared to provide the necessary information required by the Department of Health and Human Services and the state of Arkansas. The purpose of this memorandum is to provide information relevant to the Federal Part I Unified Rate Review Template (URRT).

This filing establishes rates intended to be used for non-grandfathered PPACA compliant small group health benefit plans sold off the Small Business Health Options Program in Arkansas for the 2024 plan year. [REDACTED]

[REDACTED] The rates and other information in this submission are based on the current regulations and guidance from HHS. Changes to this filing may be necessary if there are revisions to the regulations or updated guidance from HHS.

This memorandum is intended solely for the information of and use by the Department of Health and Human Services and the Arkansas Department of Insurance and Financial Services. It will demonstrate compliance with state and federal laws and regulations related to the development of the index rate and allowable rating factors and is not intended to be used for any other purpose.

The attached document contains confidential, proprietary information and trade secrets. This information is strictly confidential and protected from disclosure by Bulletin 2-2015, A.C.A. §§23-61-107 and 25-19-105(b)(9)(A). If the prohibition against disclosure by the Arkansas Department of Insurance and Financial Services is reassessed at a later date, it may not be disclosed to any other state or federal regulatory agencies unless the recipient agrees in writing prior to receipt to maintain the confidentiality of the information.

Section 2: General Information

Company Identifying Information

Company Legal Name: UnitedHealthcare of Arkansas, Inc.
State: Arkansas
HIOS Issuer ID: 65817
Market: Small Business, 1-50
Proposed Effective Date: January 1, 2024

Primary Contact Information

Name: [REDACTED]
Telephone Number: [REDACTED]
Email Address: [REDACTED]

Section 3: Proposed Rate Changes

The proposed change in rates for this filing is [REDACTED] compared to our 1/1/23 filing. The proposed pricing trend is [REDACTED] annually.

The primary drivers of the proposed rate changes are the following:

- Changes in medical service costs
 - Increasing Cost of Medical Services – Annual increases in reimbursement rates to health care providers – such as hospitals, doctors and pharmaceutical companies.
 - Increased Utilization – The number of office visits and other services continues to grow. In addition, total health care spending will vary by the intensity of care and/or use of different types of health services. Patients who are sicker generally have a higher intensity of health care utilization. The price of care can be affected by the use of expensive procedures such as surgery vs. simply monitoring or providing medications.
 - Higher Costs from Deductible Leveraging – Health care costs continue to rise every year. If deductibles and copayments remain the same, a greater percentage of health care costs need to be covered by health insurance premiums each year.
 - Cost shifting from the public to the private sector – Reimbursements from the Center for Medicare and Medicaid Services (CMS) to hospitals do not generally cover all of the cost of care. The cost difference is being shifted to private health plans. Hospitals typically make up this reimbursement shortfall by charging private health plans more.

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- Impact of New Technology – Improvements to medical technology and clinical practice often result in the use of more expensive services, leading to increased health care spending and utilization.
 - Administrative costs and anticipated profit
 - UnitedHealthcare works to directly control administrative expenses by adopting better processes and technology and through the development of programs and innovations that make health care more affordable. We have led the marketplace by introducing key innovations that make health care services more accessible and affordable for customers, improve the quality and coordination of health care services, and help individuals and their physicians make more informed health care decisions.
 - Additionally, UnitedHealthcare indirectly controls medical cost payments by using appropriate payment structures with providers and facilities. UnitedHealthcare’s goal is to control costs, maximize efficiency, and work closely with physicians and providers to obtain the best value and coverage.
 - State and/or Federal government imposed taxation and fees are additional significant factors that impact health care spending. These fees include ACA taxes and fees which have increased health insurance costs and need to be reflected in premium.
 - Changes that vary by plan
 - All plan relativity factors have been updated to reflect UnitedHealthcare’s most recent pricing model.
 - The impact of any changes to plans that have occurred due to uniform modification are also reflected in the updated plan relativity factors. Please see the “Plan Adjusted Index Rate” section of the memorandum for more detail on these changes.

We refined the medical and pharmacy plan price relativities to reflect the most recent pricing methodology and pricing models. The methodology is based on UnitedHealthcare nationwide experience data, which contains utilization frequencies and unit costs by service category, in addition to claim distributions and adjustment factors for a large number of plan design variables. Benefit design parameters such as deductibles, coinsurance, copays, out-of-pocket maximums, etc. were input for each plan. The expected paid-to-allowed relativities and expected utilization differences due to differences in cost sharing for each plan are then used to develop the plan factors for each benefit plan. All benefit plans are priced consistently with each other, with the rates differing only by the estimated value of the benefits and the expected utilization differences due to differences in cost sharing. The utilization differences do not reflect differences due to health status. The net impact of all changes by plan can be found in Worksheet 2, Section I of the Unified Rate Review Template.

Significant factors driving the proposed rate changes are discussed in further detail in Section 6 (*Projection Factors*) and Section 7 (*Credibility Manual Rate Development*) of this memorandum.

Section 4: Experience and Current Period Premium, Claims and Enrollment

Paid Through Date

The experience period is January 1, 2022 to December 31, 2022, with claims paid through February 28, 2023.

Current Date

The current enrollment and premium is reported as of December 31, 2022.

Allowed and Incurred Claims Incurred During the Experience Period

Claims Description	Allowed Claims	Incurred Claims
Claims Paid as of February 28,2023		
Claims Incurred but Not Reported as of February 28,2023		

The claims data was available directly from company claims records.

Support for estimate of incurred but not reported claims

[REDACTED]

Experience Period Risk Adjustment and Reinsurance Adjustments (PMPMs)

Risk adjustments for the experience are not known at this time.

[REDACTED]

Experience Period Index Rates

[REDACTED]

Section 5: Benefit Categories

Claims were assigned to each of the benefit categories based on where services were administered and the types of medical services rendered. The benefit categories were defined by our claims department using standard industry definitions.

Inpatient Hospital

Includes non-capitated facility services for medical, surgical, maternity, mental health and substance abuse, skilled nursing, and other services provided in an inpatient facility setting and billed by the facility.

Outpatient Hospital

Includes non-capitated facility services for surgical, emergency room, laboratory, radiology, therapeutic, observation, and other services provided in an outpatient facility setting and billed by the facility.

Professional

Includes non-capitated primary care, specialist care, therapeutic, the professional component of laboratory and radiology, and other professional services, other than hospital based professionals whose payments are included in facility fees.

Other Medical

Includes non-capitated ambulatory, home health care, durable medical equipment, prosthetics, supplies, vision exams, dental services and other services.

Capitation

Includes all services provided under one or more capitated agreements.

Prescription Drug

Includes drugs dispensed by a pharmacy. This amount is net of rebates received from drug manufacturers.

Section 6: Projection Factors

Trend

Two years of annual trend were applied to our experience period to project it to the rating period. Our most recent analysis indicates annual trend in the state of Arkansas for the experience and projection years will be [REDACTED] and [REDACTED], respectively. The table below details the components of each trend factor.

Trend Component	Year 1	Year 2
Unit Cost	[REDACTED]	[REDACTED]
Utilization	[REDACTED]	[REDACTED]
Total	[REDACTED]	[REDACTED]

UnitedHealthcare develops forward-looking medical expense estimates based on a number of considerations. In general, recent/emerging claims experience is reviewed at the market level for several broad medical expense categories (inpatient, professional, pharmacy, etc.), with utilization, unit cost, and benefit leveraging identified for each category. Future trends are developed based on a projection of each component.

Utilization rates by category are measured and projected. Forward looking utilization levels are developed based on emerging market level data, supplemented by regional and/or national level utilization data. Macro-economic data is often used to develop assumptions regarding directional changes in national health care consumption rates. UnitedHealthcare uses same store analysis to reflect utilization.

Market-level unit cost projections are developed based on evaluations of current and anticipated provider contract economics, as well as consideration to both current and expected changes in non-contracted provider cost exposure. Unit cost projections also consider the estimated cost impact of new technologies, service availability/mandates, or other factors that might influence the mix of procedures. Unit cost is based on our contractual changes with providers.

In addition, market-level healthcare affordability activities that are expected to impact forward-looking medical costs are recognized. Depending on the nature of individual initiatives, the impact may be recognized in one or more of the component cost items discussed above. Only incremental activities are recognized for this purpose in the expected trend impact for any particular period.

Morbidity Adjustment

The total Morbidity Adjustment is [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Demographic Shift

The total Demographic Shift Adjustment is [REDACTED]. It is comprised of the following factors:

The HHS-specified age curve was used in rating.

Plan Design Changes

The total Plan Design Adjustment is [REDACTED]. It is comprised of the following factors:

Shift in Benefit Plan Distribution:

An adjustment of 0% was made to account for the expected change in allowed claims due to the shift in the distribution of benefit plans between the experience period and the rating period.

Other Adjustments

The total other adjustments are [REDACTED], and it is comprised of the following factors:

Composite Rating:

An adjustment was made to account for the impact of changes in the demographic mix of members in composite rated groups during the coverage period without an associated adjustment in composite rates. A nationwide study based on UnitedHealthcare commercial fully insured data is performed annually to compare the experience of groups both composite and individually rated. The study indicates a selection impact of [REDACTED] in allowed claims for composite rated groups.

Catastrophic Claims Adjustment:

An adjustment was made to account for catastrophic claims experience in the experience period. The claims were adjusted by [REDACTED] to align with expected catastrophic claim levels in the rating period.

Trend Adjustment:

An additional trend adjustment of [REDACTED] is applied to trend our rates to the mid-point of the quarter rather than the beginning of the quarter.

All Other Adjustments:

All other adjustments resulted in an adjustment of [REDACTED].

Section 7: Credibility Manual Rate Development

Adjustments Made to the Data

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Inclusion of Capitation Payments

[REDACTED]

Section 8: Credibility of Experience

We have set our rate levels based on [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Consideration was given to ASOP #25 when determining the credibility and appropriateness of the experience and the manual rate. The manual rate is sufficiently independent from the experience and can be blended with it for purposes of rate development.

Section 9: Development of Projected Index Rate

The experience period index rate is [REDACTED] PMPM.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

The projected index rate of [REDACTED] was calculated by trending and adjusting the experience period index rate to the projection period, including blending the experience with a manual rate if the experience was not fully credible. It is established in accordance with the requirements of 45 CFR §156.80(d). See sections 6, 7, and 8 of this memo for more details.

Section 10: Development of the Market-wide Adjusted Index Rate

Reinsurance

There is no reinsurance program in force for this business, and as a result there are no reinsurance recoveries to report.

Risk Adjustment Payment/Charge

UnitedHealthcare of Arkansas, Inc. anticipates paying an average of [REDACTED] for risk adjustment transfers in the state of Arkansas for the 2024 plan year, which has been grossed up to [REDACTED] for purpose of calculating the Market-wide Adjusted Index Rate. We are assuming the risk level of our business relative to that of our competitors for the 2024 plan year will be similar to what it was in the 2022 plan year. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Exchange User Fees

There are no plans included in this filing that are offered on the exchange. Therefore there are no exchange user fees.

The market adjusted index rate includes market-wide adjustments for reinsurance, risk adjustment transfers, and exchange user fees (if any).

[REDACTED]

Section 11: Plan Adjusted Index Rate

Actuarial Value and Cost Sharing Adjustment

[REDACTED]

[REDACTED]

Provider network, delivery system and utilization management adjustment

Any adjustments for these items are included in the plan relativity factors.

Benefits in Addition to EHBs

With the introduction of the URRT 5.0 and the breakout of service level EHB claims, the assumed value of [REDACTED] reflects a reasonable estimate of the EHBs.

Distribution and Administrative Costs

Distribution and administrative costs include premium tax, risk adjustment user fees, SG&A, quality improvements, federal income tax, and after-tax income. Risk adjustment transfers, net reinsurance recoveries, and exchange fees are excluded because they are accounted for in the market adjusted index rate.

Administrative Expense Load

The administrative expense load is a long-term estimate of administrative expenses, including selling expenses and general administrative expenses. This load is consistent across most products and plans. However, a small number of plans may have different expense loads due to unique features of those plans. These assumptions are based on the general ledger actual results for 2022 with known adjustments. Known adjustments include, but are not limited to, pay increases/raises for employees and administrative expenses as a result of Healthcare Reform and compliance requirements. The administrative expense allocation methodology used in pricing is appropriate because it is consistent with how UnitedHealthcare runs its business and how it allocates administrative costs for Statutory Filings and the Healthcare Reform Exhibits.

Profit and Risk Margin

The profit and risk margin is shown in Worksheet 2, Section 3 of the URRT.



The profit and risk margin results in an anticipated MLR that is above the minimum requirements as described in the Projected Loss Ratio section.

Taxes and Fees

Taxes and fees are expected to be [REDACTED] and include premium tax, exchange fees (if any), risk adjustment user fees, and federal income tax. The following is a breakdown of the taxes and fees.

Premium Taxes and Fee Allocation	Estimated % of Premium
Premium/Retaliatory Tax	[REDACTED]
Exchange User Fee	[REDACTED]
Risk Adjustment User Fee	[REDACTED]
PCORI Fees	[REDACTED]
Federal/State Income Tax	[REDACTED]
All Other Taxes & Fees	[REDACTED]

Section 12: Calibration

Plan Adjusted Index Rates need to be calibrated to apply the allowable rating factors of age and geography in order to calculate the Consumer Adjusted Premium Rates. Calibration factors are applied uniformly to all plans.

Age Calibration

The calculated age curve calibration is [REDACTED], which equals the one divided by the average age factor of the expected member distribution by age. The age factors used in this calculation are the HHS-specified age curve. Please see the Age Calibration exhibit near the end of this document.

Geographic Calibration

The geographic factor calibration is [REDACTED], which equals the one divided by the expected average area factor. A table of the geographic rating factors is below.

Rating Area	Area Factor
[REDACTED]	[REDACTED]

Geographic rating factors are reviewed periodically versus UnitedHealthcare claims data that reflects unit cost differences by county. Such a review was conducted as part of our January 1, 2024 rate development. [REDACTED]

Population morbidity by area was not considered when determining geographic area factors.

Tobacco Calibration

Calibrating the plan adjusted index rate to the age curve and geographic distribution results in the calibrated plan adjusted index rate for each plan. The calibrated plan adjusted index rate represents the preliminary premium rate charged to an individual before applying the consumer specific rating adjustments for age and area.

Section 13: Consumer Adjusted Premium Rate Development

The consumer adjusted premium rate is the final premium rate that is charged to an individual. It is developed by calibrating the plan adjusted index rate, and applying the consumer specific age, and geographic rating factors. The calculation is provided below.

$$\begin{array}{r} \text{Plan Adjusted Index Rate} \\ X \text{ Age Calibration Factor} \\ X \text{ Geographic Calibration Factor} \\ X \text{ Consumer Specific Age Rating Factor} \\ X \text{ Consumer Specific Geographic Rating Factor} \\ X \text{ Small Group Trend Adjustment} \\ \hline = \text{Consumer Adjusted Premium Rate} \end{array}$$

Section 14: Projected Loss Ratio

The projected loss ratio using the federally prescribed MLR methodology for calendar year 2024 is [REDACTED]. UnitedHealthcare of Arkansas, Inc. agrees to comply with the rebate requirements of 45 CFR Part 158 should the actual market MLR fall below the 80.0% requirement.

Section 15: AV Metal Values

The AV calculator used to calculate the AV metal values is based on a prescribed methodology and, therefore, does not necessarily reflect a reasonable estimate of the portion of allowed costs covered by the associated plan.

Some plans within this portfolio have cost sharing features that differ between individual and family coverage (i.e., when two or more people are covered by the plan). For all plans, consistent with the Actuarial Value Calculator inputs, we have used only the cost sharing provisions applicable for individuals in the actuarial value calculation.

The AV calculator was used to determine the AV metal values shown in Worksheet 2 of the Part I Unified Rate Review Template for all plans. The values were developed in accordance with generally accepted actuarial principles and methodologies.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted text block]

[Redacted text block]

[Redacted text block]




[Redacted text block]

Section 16: Membership Projections

The 2024 plan year membership projection was developed utilizing the experience period plan level membership distribution along with sales and persistency targets.

Member distribution by plan was then based on current enrollment, taking into consideration changes in the portfolio of plans to be offered in 2024. Strictly for purposes of the URRT, we have projected membership by plan.

Section 17: Terminated Plans and Products


A list of terminated Single Risk Pool plans can be found in the appendix. Terminated plans will be mapped to another plan in the projection period for purposes of completing the URRT. The mapping is included in the appendix. It should be noted that this mapping is preliminary and may deviate based on business decisions and practices at a future date.

Section 18: Plan Type

A plan type of HMO has been selected, which describes the plans exactly.

Section 19: Reliance

Due to responsibility allocation, I have relied upon other individuals within the UnitedHealthcare organization to provide certain assumptions. Although I have performed a limited review of the information and have not found it unreasonable or inconsistent, I have not reviewed it in enough detail to fully judge the reasonableness of the information due to the substantial amount of additional time required. I have therefore relied upon the expertise of those individuals who have developed the assumptions, and am providing the information required by Actuarial Standard of Practice 41, section 4.3. A list of reliances is included below.

UnitedHealthcare Finance Department

- Projected SG&A Assumption

UnitedHealthcare National Pricing Team

- Plan Relativity Modeling

UnitedHealthcare Healthcare Economics Department

- Projected Trend
- Claims Reserves
- ACO/Premium Designated Provider Cost Savings Estimates

Section 20: Actuarial Certification

I, [REDACTED] for UnitedHealthcare and a member of the American Academy of Actuaries. I meet the Academy's qualification standards for rendering statements of actuarial opinion with respect to the filing of rates for health insurance products.

To the best of my knowledge and judgment, I certify that:

- The projected index rate is:
 - In compliance with state and federal statutes and regulations related to the development of the index rate and allowable rating factors (such as 45 CFR 156.80 and 147.102),
 - Developed in compliance with the applicable Actuarial Standards of Practice,
 - Reasonable in relation to the benefits provided and population anticipated to be covered,
 - Neither excessive, deficient, nor unfairly discriminatory.
- The index rate and only the allowable modifiers as described in 45 CFR 156.80(d)(1) and 45 CFR 156.80(d)(2) were used to generate plan level rates.
- The geographic rating factors reflect only differences in the costs of delivery and do not include differences for population morbidity by geographic area.
- The AV calculator was used to determine the AV metal values shown in Worksheet 2 of the Part I Unified Rate Review Template for all plans. Some of our plan designs are not directly compatible with the AV calculator. The values were developed in accordance with generally accepted actuarial principles and methodologies. The unique plan design actuarial certification required by 45 CFR Part 156.135 has been separately attached.
- The Part I Unified Rate Review Template does not demonstrate the process used by the issuer to develop their rates. Rather, it represents information required by federal regulation to be provided in support of the review of rate increases, for certification of qualified health plans for federally facilitated exchanges, and for certification that the index rate is developed in accordance with federal regulation and used consistently and only adjusted by the allowable modifiers.

