Attachment A: Support Items for Rate Review

OSI's actuary, NovaRest, recommends the following additional support items for carriers to provide in their initial rate filing submission.

1. Was an adjustment made for the following? If so, please provide narrative and quantitative support detailing all assumptions as well as explain where the adjustment is applied.
    a. COVID-19
    b. American Rescue Plan Act (ARPA)
    c. Extended Special Enrollment Period
    d. Risk Adjustment Data Validation (RADV)
    e. Risk Adjustment High Cost Pooling Mechanism
    f. Silver-Loading Surcharge
    g. Medicaid Maintenance of Eligibility (MOE)
    h. All 'Other' Adjustments
    i. Insulin Cap
    j. Surprise Billing Statute
    k. Transitional policies

2. What is the basis used to develop 2022 rates? Please note HHS expects the URRT to be completed with 2020 experience, with an adjustment in the 'Other' if any other experience data was used, such as 2019 experience.

3. Please break-out the induced demand factors from the AV and cost sharing factors. a. Please also show that the induced demand factors are normalized. Any additional utilization is not allowed by 45 CFR 156.80(d)(2).

4. Please identify any value-added services/benefits and explain how the cost of these programs are factored into the final rates.

5. Please provide an exhibit demonstrating compliance with the federal MLR requirements

6. Please provide detailed support for any change in geographic rating factors

7. Please provide detailed support for any significant change (+-10%) in projected enrollment.

8. Please provide documentation of and support (including actuarial certification) for the metal AV Calculation which reflects $0 cost sharing for Behavioral Health benefits. The documentation provide should comply with the acceptable alternate methods for calculating the metal level AV, pursuant to of 45 CFR 156.135(b)(2) or 156.135(b)(3).

9. Please provide support for state premium taxes/assessments. The state assessment will be set in July and carriers will be expected to update the payment in the second round of filing.