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The OIR is currently in the process of increasing the efficiency of the filing review process. Please note the changes to the document and the PPACA filing process are in result of the Office's pursuit.

With the initial submission of your PPACA-compliant filing, please provide the following information:

1. An actuarial memorandum in compliance with federal law and any other documents submitted in the federal HIOS/URR filing.
2. An actuarial memorandum in compliance with Florida law per Rule 69O-149.006, F.A.C., or Rule 69O- 191, F.A.C.
3. Please fill out the Data Template provided on 5/4/2020.
 - Please submit the first update via the IRFS System in June 17th filing.
 - The second update will be after risk adjustment is released in the 2021 plan year filing.
4. Please provide a demonstration of the determination of the magnitude of the utilization and cost trends by each of the categories in the URR template. Please provide in Excel with active formulas.
5. Please specify the 2018, 2019, and 2020 target loss ratios for Florida. Please clarify if the company is proposing a change in the target loss ratio under Rule 69O-149.006(3)(b)20., F.A.C. If so, please be sure to use the current target in the experience exhibit before a change and the proposed target in the experience exhibit with the proposed change in projected years.
6. Please specify the overall change due to these factors:
 - a. changes to risk pool
 - b. individual mandate
 - c. contracting changes
 - d. association health plans
 - e. short term medical plans
 - f. risk adjustment
 - g. Health Insurer Fee
 - h. health sharing ministries
7. Please specify which counties are seeing the highest and lowest increases.
8. Please specify which metal levels are seeing the highest and lowest increase.
9. Please specify which networks levels are seeing the highest and lowest increase.

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10. Please provide the actual average actuarial value by metal level.
11. Please specify if the company is terminating any forms. If so, please provide the form names.
12. Please demonstrate whether the impact of the change in benefits meets or exceeds the +2 percent threshold as defined in 45 CFR 147.106(e)(3)(v).
13. Please note in the initial filing, impacts for Covid-19 should be 0.0%. Please submit a separate exhibit in Excel detailing the company's projected COVID-19 factor and provide a detailed description of the methodology used to develop the factor.

For your information:

- Documents not uploaded as "trade secret" may be accessed through the public record. Labeling a document as trade secret, confidential, or proprietary is not sufficient to ensure that the document is excluded from the public record. Please refer to the following:
 - Trade secret documents must be submitted in the "Trade Secret Supplementary Information" filing component.
 - All trade secret documents must have the label "Trade Secret" on every page per Section 624.4213(1)(a), F.S.
 - Trade secret documents must be submitted separately from non-trade secret documents per Section 624.4213(1)(b), F.S.
 - All trade secret documents must be accompanied with a justification document that fully describes the factual basis entitling the items to protection per Section 624.4213(1)(c), F.S. Failure to provide the justification document constitutes a waiver of any claim that the information is trade secret.
 - Trade Secret Regulations: Section 688.002(4), F.S., Section 624.4213, F.S., Section 812.081, F.S., Section 815.045, F.S.
- If, for any reason, your response involves the resubmission of a document, actuarial memorandum, spreadsheet, PDF, etc., please highlight all changes where possible. This will allow for a faster review of the filing.
 - All numerical exhibits, including rate pages, must be provided in Excel spreadsheets with active formulas, where applicable.
 - Please include the Office's clarification item followed by the company's response in the same order and with the same numbering used above.
 - Further explanation and or justification of actuarial principles must be signed by a qualified actuary. If the company's response includes actuarial justification, then the letter must be signed by the appropriate actuary. A separate document from the actuary does not suffice.
 - Upload all documents with document titles that accurately reflect their contents. Please revise the default title as necessary. Exhibits and actuarial responses should not be uploaded as "Rate Pages". The file name and file path of a document are not captured in IRFS. Only the document title and type are available to the filing reviewer.

Sincerely,
Office of Insurance Regulation