



Part III Actuarial Memorandum

Community Health Alliance Mutual Insurance Company Individual Rate Filing Effective January 1, 2016 REVISED October 9, 2015

Prepared for:
Community Health Alliance Mutual Insurance Company

Prepared by:
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1. GENERAL INFORMATION

This document contains the Part III Actuarial Memorandum for Community Health Alliance Mutual Insurance Company's (CHA's) individual medical block of business, effective January 1, 2016. This Actuarial Memorandum is submitted in conjunction with the Part I Unified Rate Review Template (URRT).

The purpose of the Actuarial Memorandum is to provide certain information related to the submission of the premium rate filing, including support for the values entered in the Part I URRT and Part II Preliminary Justification (which supports compliance with the market rating rules and reasonableness of applicable rate increases). This memorandum may not be appropriate for other purposes.

The information in this Actuarial Memorandum has been prepared for the use of CHA. We understand the Actuarial Memorandum will be provided to the Tennessee Department of Commerce and Insurance, the Center for Consumer Information and Insurance Oversight (CCIO), and their subcontractors to assist in the review of CHA's rate filing. We understand the information provided may be considered public documents and, as such, may be subject to disclosure to other third parties. Milliman makes no representations or warranties regarding the contents of this letter to third parties. Likewise, third parties are instructed to place no reliance upon this Actuarial Memorandum or rate filing prepared for CHA by Milliman that would result in the creation of any duty or liability under any theory of law by Milliman to any third party.

The results are actuarial projections. Actual experience will differ for a number of reasons including, but not necessarily limited to, population changes, claims experience, and random deviations from assumptions.

Please note the rate development in this filing is contingent upon the continued availability of federal subsidies under the Affordable Care Act (ACA) in 2016. If federal subsidies in their current form are not available to eligible residents of Tennessee, substantial changes to this filing may be required.

Company Identifying Information

Company Legal Name:	Community Health Alliance Mutual Insurance Company
State:	Tennessee
HIOS Issuer ID:	66842
Market:	Individual
Effective Date:	January 1, 2016

Company Contact Information

Primary Contact Name:	Lynda Johnson, ASA, MAAA
Primary Contact Telephone Number:	(423) 305-4900
Primary Contact Email-Address:	ljohnson@chatn.org

2. PROPOSED RATE INCREASE(S)

This submission is for rate revisions to CHA's existing individual medical ACA-compliant products, as presented by HIOS Plan ID in the applicable line of Worksheet 2 in the URRT. The new rates are effective for individuals with an effective date or renewal date of January 1, 2016 through December 31, 2016. The average proposed rate change across all plans and regions from the most recently approved rates effective January 1, 2015 is approximately 51.9%. The rate change varies by plan and region. The minimum and maximum rate changes are 32.8% and 90.1%, respectively.

There are a number of 2015 to 2016 changes causing the rate increase to vary by plan and region, including changes in plan benefits, pricing model changes in determining pricing values and the plan

design behavior factors, changes to the provider reimbursements, and revised retention assumptions. These changes are applied at the benefit plan level resulting in different rate increases by plan.

There are no significant changes in cost sharing except when necessary to comply with the most recent 2016 Actuarial Value (AV) Calculator or to mitigate the changes in cost and utilization of medical care. There are no changes to rating factors (e.g., age, tobacco) in this rate filing other than to the base premium rate, area factors, and rate relativities by plan.

The reasons for the rate change are:

- Expected future medical inflation and utilization changes,
- Benefit design changes to comply with the Federal Actuarial Value Calculator,
- Changes in ACA taxes and fees,
- Changes in expected Federal Transitional Reinsurance Program,
- CHA's expected risk profile relative to the state wide average,
- Changes in provider contracting arrangements,
- Change in the mix of business, and
- Changes in administrative fees and requested profit margin.

3. EXPERIENCE PERIOD PREMIUM AND CLAIMS

Claims Paid Through Date

Incurred claims presented in Worksheet 1, Section I of the URRT for the experience period from January 1, 2014 through December 31, 2014 are based on claims paid through March 31, 2015.

Premiums (Net of MLR Rebate) in Experience Period

The earned premium reported in Worksheet 1 of the URRT reflects the sum of member level premium for the experience period (calendar year 2014). CHA's 2014 individual ACA loss ratio exceeded the MLR requirement. Therefore, an adjustment for MLR rebates was not included.

Allowed and Incurred Claims Incurred During the Experience Period

Table 1 provides a breakdown of the allowed and incurred claims during the experience period, as illustrated in Worksheet 1, Section I of the URRT.

Table 1 Community Health Alliance Mutual Insurance Company 2014 Incurred Claims Summary		
Claim Category	2014 Allowed Claims	2014 Incurred Claims
Claims with Run-out through March 31, 2015 ¹	\$1,408,279	\$1,157,673
Incurred but not Reported (IBNR)	\$52,838	\$47,462
Total Incurred (URRT Worksheet 1)	\$1,461,117	\$1,205,135

¹Net of cost-sharing reduction subsidies

Medical and pharmacy claims are processed by separate external vendors and reflect the applicable values from these third-party administrators' claim payment system for fee-for-service claims (i.e., not capitated) received and paid during the experience period. Incurred claims were provided directly from CHA claim reports. Allowed claims were calculated as paid claims plus estimated member cost sharing. All incurred and allowed claims were paid through March 31, 2015.

Incurred but not paid (IBNP) claims are estimated using the lag method and a lag triangle paid through April 21, 2015. Incurred claims are calculated as paid claims plus IBNP.

We developed completion factors based on the ratio of incurred to paid claims. We developed the completion ratio based on CHA's "sister" company's claims as we expect the claim payment patterns to be similar since the same claims processor is used and CHA did not have sufficient volume to rely on its claims. We multiplied allowed claims by the same completion factor applied to paid claims, and subtracted allowed claims to develop allowed IBNP. Total allowed in the experience period equals allowed claims plus allowed IBNP, as illustrated in Table 1.

4. BENEFIT CATEGORIES

Benefit categories are based on place and type of service as follows:

- 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 surgery, emergency room, lab, radiology, therapy, observation, and other services provided in an outpatient facility setting and billed by the facility.
- Professional includes non-capitated primary care, specialist, therapy, 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 ambulance, home health care, DME, prosthetics, supplies, vision exams, dental services, and other services. The measurement units for utilization used in this category are a mix of visits, cases, procedures, etc.
- Prescription Drug includes prescriptions not billed by a facility or professional.

5. PROJECTION FACTORS

CHA's 2016 individual rates rely completely (i.e., 100%) on a manual rate development given the lack of credible experience in 2014.

Changes in the Morbidity of the Population Insured

Not Applicable

Changes in Benefits

Not Applicable

Changes in Demographics

Not Applicable

Other Adjustments

Not Applicable

Trend Factors

Not Applicable

6. CREDIBILITY MANUAL RATE DEVELOPMENT

CHA's rates are based 100% on a manual rate development because of minimal 2014 individual enrollment and the lack of credible 2014 experience.

Source and Appropriateness of Experience Data Used

Source

We used the 2014 individual experience from CHA's "sister" organization in South Carolina, Consumers' Choice Health Insurance Company (CCHP), as the basis for the manual rate. The manual rate basis includes over \$211.4 million in allowed charges and 450,000 member months.

Appropriateness

CCHP's 2014 individual market experience was selected as the manual rate basis for several reasons. First, the details underlying the manual rate such as the demographic distribution, plan mix, and average provider reimbursement were known. This allowed us to project differences from the manual rate to the projected rate basis with more information than simply historical Tennessee individual market experience. Second, the full calendar year Tennessee individual market data publicly available at this time is 2013, which does not reflect the anticipated morbidity of the post-Affordable Care Act (ACA) Tennessee individual single risk pool. Not only is CCHP's experience robust and credible, it reflects post-ACA morbidity. Finally, many processes (claim processing, customer service, marketing, etc.) are mirrored between the two organizations, and they share other similarities because they are "sister" organizations.

Adjustments Made to the Data

With CCHP's 2014 claim costs as a starting point, we adjusted the experience for the following differences between Tennessee and South Carolina.

Changes in the Morbidity of the Population Insured

We made no assumption for differences in morbidity between the South Carolina manual rate experience and CHA's 2016 Tennessee projection.

Changes in Benefits

The covered benefits underlying the 2014 manual experience are the same as the 2016 covered benefits for CHA. However, there is an adjustment for changes in benefits to reflect the different mix of plan richness between the manual rate basis and the projection period as well as the differing percentage of members receiving subsidized cost sharing. We estimated this impact to be an [REDACTED] to the manual rate claims based on Milliman's Commercial *Health Cost Guidelines* (HCGs) and the Federal behavior change factors from the risk score formula.

Changes in Demographics

The distribution of members by age and gender of members in the projection period (calendar year 2016) for CHA are expected to be different than the distribution of members by age and gender underlying the manual rate. Specifically, we [REDACTED] the manual rate claims approximately [REDACTED] for the difference in demographics.

Other Adjustments

We applied a [REDACTED] to the manual rate claims cost to reflect the projected differences in the geographic costs between the manual rate basis and the projection period. This assumption was based on Milliman's HCGs.

Further, we applied a [REDACTED] to the manual rate claims for anticipated differences in provider reimbursement levels between the manual rate experience and the projected 2016 CHA claims cost. The projected provider reimbursement differences are largely due to narrow networks (which have more favorable provider reimbursement arrangements) in the projection period.

Finally, we [REDACTED] the manual rate claim costs approximately [REDACTED] for projected tobacco usage differences between CHA and the manual rate basis.

Trend Factors

We trended the 2014 manual rate claims cost forward to 2016 assuming an aggregate annual [REDACTED] trend. Given the lack of credible CHA experience, we developed the trend assumptions using general industry knowledge regarding recent trends in medical inflation, Milliman research, and judgment.

Inclusion of Capitation Payments

Not applicable.

7. CREDIBILITY OF EXPERIENCE

CHA's 2014 ACA individual experience represents about 1,900 member months. We considered this to be 0% credible for the purpose of projecting a 2016 premium rate. Our assignment of 0% credibility considered items beyond the limited volume such significant shifts in the composition of members between 2014 and 2016 due to membership growth since 2014.

8. PAID TO ALLOWED RATIO

The Paid to Allowed ratio shown in Worksheet 1, Section III of the URRT is the average ratio of Paid (i.e., after member cost sharing) to Allowed (i.e., before member cost sharing) claims for each plan, weighted by projected member months by plan. Please refer to Appendix A for details. Appendix A uses membership consistent with the projections in Worksheet 2, Section IV of the URRT.

9. RISK ADJUSTMENT AND REINSURANCE

Experience Period Risk Adjustments PMPM

Due to CHA's limited 2014 individual market enrollment and lack of information regarding CHA's 2014 risk score relative to the statewide Tennessee risk score, we assume CHA's risk score will equal the statewide average. Thus, we have entered zero for each plan's experience Risk Adjustment transfer in URRT Worksheet 2 Section III but did include the \$0.08 PMPM risk adjustment user fee, per HHS's instructions.

Projected Risk Adjustments PMPM

We project CHA's risk profile will be better than the state average risk pool. Specifically we assumed CHA will pay [REDACTED] into the Federal Risk Adjustment program. We also included the \$0.15 PMPM administrative fee.

Experience Period Reinsurance PMPM

Estimates for Federal Reinsurance received for each plan (net of the required contribution of \$5.25 PMPM) in the experience period were provided by CHA and are illustrated in URRT Worksheet 2, Section III. CHA developed this estimate based on a review of its large claims in 2014 for its individual ACA-compliant plans.

Projected Reinsurance Recoveries PMPM

We estimated Federal reinsurance recoveries in the projection period will be \$15.65 PMPM, as illustrated in URRT Worksheet 1, Section III. This amount is net of the 2016 reinsurance contribution of \$2.25 PMPM. The recoveries assume CHA will receive 50% of all CHA's individual members' per member per year incurred claims between \$90,000 and \$250,000, which is consistent with the 2016 Final Notice of Benefit and Payment Parameters released on February 20, 2015.

We estimated the recoveries using Milliman's *HCGs* claim probability distributions (CPDs) calibrated to CHA's projected experience. CPDs are a frequency distribution of claim amounts that can be used to estimate PMPM claims between deductibles and stop-loss amounts. Exhibit 1 displays the calculations. The net recoveries were applied to the Index Rate on an allowed basis in the development of the Market Adjusted Index Rate as required by CMS.

10. NON-BENEFIT EXPENSES AND PROFIT & RISK

Exhibit 2 summarizes the net expense development.

Administrative Expense Load

We estimate CHA's administrative expenses to be \$48.47 PMPM. This estimate is a combination of fixed PMPM administrative expenses and percent of premium expenses. This estimate is entered as a percent of premium in Worksheet 1, Section III of the URRT. The administrative expenses were developed by CHA based on a projection of 2016 expenses using 2015 budgeted expenses and anticipated changes from 2015 to 2016. This amount does not include any profit, risk load, taxes, or assessments described below. Table 2 below summarizes CHA's administrative expenses.

Table 2 Community Health Alliance Mutual Insurance Company Projected Administrative Expenses		
Description	PMPM	% of Premium
Fixed General Admin		
Variable General Admin		
Commercial Reinsurance Recoveries		
Commercial Reinsurance Premiums		
Total Administrative Expenses	\$48.47	12.12%

Profit and Risk Margin

The proposed rates reflect a composite 5.69% contribution to surplus, which varies by plan. The profit margin was provided to us by CHA and was not developed by Milliman.

Taxes and Fees

Table 3 provides a breakdown of projected taxes and fees illustrated in Worksheet 1, Section III of the URRT, as a PMPM and percent of premium.

Table 3 Community Health Alliance Mutual Insurance Company Projected Taxes and Fees		
Description	PMPM	% of Premium
PCORI		
Premium Tax		
Health Insurer Fee		
Effective Exchange Fee ¹		
Total Taxes and Fees	\$22.11	5.53%

¹Effective fee after allocating the 3.5% fee for exchange business across total block

The exchange user fee was applied as an adjustment to the index rate at the market level. Specifically, the 3.5% of premium exchange user fee was allocated across all projected individual enrollment both on and off exchange.

11. PROJECTED LOSS RATIO

The projected loss ratio based on the federally prescribed MLR methodology, excluding adjustments for credibility, is approximately [REDACTED]. Exhibit 3 displays the development of the MLR in more detail.

12. SINGLE RISK POOL

The single risk pool was developed in accordance with the requirements in 45 CFR 156.80(d). CHA does not have any individual transitional plans or individual grandfathered plans.

13. INDEX RATE

The experience index rate represents the estimated total combined allowed PMPM claims for essential health benefits (EHBs). The index rate has not been adjusted for risk adjustment transfers, reinsurance fees / recoveries, or Marketplace user fees. The experience period index rate is equal to the experience period total allowed claims PMPM, since there are no benefits that were offered beyond EHB benefits. Section 3 (Experience Period Premium and Claim) describes the development of the experience index rate.

The index rate for the projection period is a measurement of average allowed claims PMPM for EHBs. Section 6 (Credibility Manual Rate Development) of this memorandum describes the development of the projected index rate. The projected Index Rate is equal to the projected total allowed claims PMPM since there are no benefits offered beyond the EHBs.

The projected index rate for January 1, 2016 through December 31, 2016 is in Worksheet 1, Section III of the URRT and in Table 4. As described in Section 6 of this Memorandum, the projected index rate reflects the anticipated claim level of the projection period with respect to trend, benefits, morbidity, demographics, and other projection factors. Please refer to Section 6 (Credibility Manual Rate Development) for a description of the factors applied to the manual rate to develop the projected index rate.

Table 4 Community Health Alliance Mutual Insurance Company Projected Index Rate Development	
Item	Value
2014 Rate Manual Experience Allowed Claims PMPM	
Morbidity Adjustment	
2 Year Claims Trend	
Other Factors (Demographic, Plan Mix, etc.)	
2016 Projected Index Rate	\$457.55

14. MARKET-ADJUSTED INDEX RATE

The market-adjusted index rate is calculated as the index rate adjusted for all allowable market-wide modifiers defined under the market rating rules in 45 CFR Part 156, §156.80(d)(1). Table 5 shows the development of the market-adjusted index rate. (All components in the calculation were derived elsewhere in this memorandum.) The adjustments in Table 5 are applied to the Index Rate on an allowed basis as required by CMS.

Table 5 Community Health Alliance Mutual Insurance Company Market Adjusted Index Rate		
Item	Value	Annotation
Index Rate	\$457.55	1
Net Risk Adjustment	\$20.14	2
Net Transitional Reinsurance	-\$15.65	3
Exchange Fee		4
Paid to Allowed Ratio	0.660	5
Market Adjustments (Allowed Basis)		(6) = [(2)+(3)+4] / (5)
Market Adjusted Index Rate		(7) = (1) + (6)

15. PLAN-ADJUSTED INDEX RATE

Experience Period Plan-Adjusted Index Rates

The experience period Plan-Adjusted Index Rates shown in URRT Worksheet 2, Section III are calculated for each plan as the plan's age-21 rate in 2014 times the composite age and geographic factors developed as part of 2014 pricing. Consistent with HHS's instructions to show mapped experience in the mapped plan's column, the experience period plan-adjusted index rates for terminated plans have been mapped to the appropriate plan's column in the URRT.

Projection Period Plan-Adjusted Index Rates

The development of the plan-adjusted index rates are shown in Appendix B and URRT Worksheet 2, Section IV. The market-adjusted index rate is adjusted to compute the plan-adjusted index rates using the following allowable adjustments:

Actuarial Value and Cost Sharing Adjustment

- The Actuarial Value and Plan Design Behavior Change factors were developed in an internal Milliman cost relativity model, which is based on Milliman's commercial HCGs, with adjustments based on actuarial judgment. This model estimates actuarial equivalent relative values of different benefit plans using estimated medical costs calibrated to CHA's experience. Health status was not used to establish benefit plan relativities.

- The impact of the 20% load CHA applies for tobacco use is included in the AV and Cost Sharing adjustment, per the URRT instructions.

Provider Network, Delivery System and Utilization Management Adjustment

The value of each provider network was determined based on the experience of CHA and any anticipated differences in the network of a given plan as compared to the current network.

Adjustment for Benefits in Addition to the EHB

CHA does not offer any non-EHB benefits.

Adjustment for Distribution and Administrative Costs

We developed and applied the distribution and administrative costs to each plan as a mix of “percent of premium”, “percent of claim”, and PMPM bases.

Catastrophic Adjustment

Not Applicable. CHA does not offer a catastrophic plan.

16. CALIBRATION

A single calibration factor was applied to the Plan Adjusted Index Rates to calibrate rates for the expected age and geographic distributions expected to enroll in the plan. The single calibration factor is applied uniformly across all plans.

The approximate weighted average age of the projected single risk pool is ■ years. We calculated the risk pool weighted average age by projecting membership on a 5-year age group. The age curve calibration is applied to all plans. The weighted average age curve calibration factor is ■. The age curve calibration factor also includes an adjustment to account for the fact that CHA cannot rate for more than 3 children per family. This adjustment is approximately ■. The calibration to the age curve complies with the rating rules specified in 45 CFR Part 147, §147.102.

CHA applies geographic rating factors to its plans as shown in Table 6. The geographic area factors vary from CHA’s 2015 filing due to changes in CHA’s provider reimbursement in each area. Health status is not reflected in the geographic factors, and it is not CHA’s intent to use area factors to rate for morbidity.

Table 6 Community Health Alliance Mutual Insurance Company Geographic Factors	
Rating Area	Factor
Rating Area 1	■
Rating Area 2	■
Rating Area 3	■
Rating Area 4	■
Rating Area 5	■
Rating Area 6	■
Rating Area 7	■
Rating Area 8	■

The development of the plan-adjusted calibrated index rates are shown in Appendix C.

17. CONSUMER-ADJUSTED PREMIUM RATE DEVELOPMENT

The consumer-adjusted premium rate is the final premium rate for a plan charged to an individual, family, or small employer group utilizing the rating and premium adjustments as articulated in the applicable market reform rating rules. It is the product of the plan-adjusted index rate after calibration, the geographic rating factor, and the age rating factor.

The plan-adjusted index rates and the geographic factors are shown in Appendix B and Table 6, respectively. CHA uses the Federal age curve.

The development of the consumer-adjusted premium rates are shown in Appendix D.

18. AV METAL LEVELS

The AV Metal Values included in Worksheet 2, Section I of the URRT were developed using the 2016 CMS Actuarial Value Calculator. For some plans, it was necessary to use an alternate methodology to develop the AV Metal Value because the plan design couldn't be valued in the AVC. The attached actuarial certification and supplemental memorandum in Appendix F includes additional detail describing these calculations.

19. AV PRICING VALUES

Appendix E provides a summary of the AV Pricing Values by plan, as illustrated in Worksheet 2, Section I, and a breakdown of the components attributable to each of the allowable modifiers to the index rate, as described in 45 CFR Part 156, §156.80(d)(2), to arrive at the plan level rate.

The impact of each plan's actuarial value and cost sharing includes the expected impact of each plan's cost-sharing amounts on the member's utilization of services, excluding expected differences in the morbidity of the members assumed to select the plan. We used the Milliman's HCGs to estimate the value of cost-sharing and relative utilization of services for each plan, with adjustments based on actuarial judgment. Our pricing models assume the same demographic and risk characteristics for each plan priced, thereby excluding expected differences in the morbidity of members assumed to select the plan.

20. MEMBERSHIP PROJECTIONS

Membership projections, as illustrated in Worksheet 2, Section IV of the URRT were developed by CHA based on consideration for the following:

- 2014 and 2015 YTD through April sales for CHA's individual products,
- Sales distribution and provider networks,
- Anticipated activity in the Tennessee individual health insurance market due to various health care reform provisions.

CHA used its early 2015 enrollment to project the enrollment distribution by plan and network.

Table 7 includes our assumed CSR distribution based on CHA's 2014 individual experience.

Table 7 Community Health Alliance Mutual Insurance Company Silver Metal Tier	
Silver Plan	Distribution
Silver 94%	
Silver 87%	
Silver 73%	
Silver 70%	

21. TERMINATED PRODUCTS

CHA terminated all 2014 plans prior to January 1, 2015. All applicable plans were cross-walked to a 2015 plan. CHA did not terminate any of its individual products offered in 2015. All 2014 plans that did not have membership and were not mapped to a new plan are included in Worksheet 2 of the URRT as terminated.

In 2014 CHA offered the same HIOS ID for a given plan across all rating areas. In 2015 CHA created a set of HIOS IDs for specific region and network combinations. We cross-walked the terminated plans (and the applicable membership, premium, and claims) in 2014 to the corresponding 2016 HIOS IDs in each specific region and network for presentation purpose in Worksheet 2 of the URRT. Exhibit 4 contains the mapping of the HIOS IDs from 2014 to 2016 as well as those 2014 plans CHA terminated.

22. PLAN TYPE

All of CHA's plans are PPO plans, as noted in Worksheet 2, Section I of the URRT.

23. WARNING ALERTS

The following warning alerts appear in Worksheet 2, Section III of the URRT:

- Plan Adjusted Index Rate: This value is compared to the "Premiums (net of MLR Rebate) in Experience Period" PMPM in Worksheet 1, Section I. The Premiums (net of MLR rebates) PMPM in Worksheet 1 should be consistent with 2014 experience while the values in Worksheet 2 should be based on the Plan Adjusted Index Rate from the 2014 pricing. As such, we would expect these values not to tie. The differences are due mainly to assumptions made in the 2014 pricing that were not experienced in practice. Most notably is the large difference in the average age in the 2014 projection period compared to actual 2014 experience.
- Total Premium (TP): This value is compared to the "Premiums (net of MLR Rebate) in Experience Period" in Worksheet 1, Section I. The total Premiums (net of MLR rebates) in Worksheet 1 should be consistent with 2014 experience, while the values in Worksheet 2 should be based on the Plan Adjusted Index Rate from 2014. As such, we would expect these values not to tie. The differences are due mainly to assumptions made in the 2014 pricing that were not realized in the experience. Most notably is the large difference in the average age in the 2014 projection period compared to actual 2014 experience.
- Total Incurred claims, payable with issuer funds: This value is compared to the total "Incurred Claims in Experience Period" in Worksheet 1, Section 1. The total Incurred Claims in Worksheet 1, Section 1 should account for allowed charges adjusted only for member cost sharing and funds paid by HHS on behalf of low-income members. The Total Incurred Claims in Worksheet 2, Section III account for these as well as both Risk Adjustment and Reinsurance transfers (net of fees for these programs). As such, we would not expect these values to match.

- Incurred Claims PMPM: This value is compared to the “Incurred Claims in Experience Period” PMPM in Worksheet 1, Section 1. The Incurred Claims PMPM in Worksheet 1, Section 1 should account for allowed charges adjusted only for member cost sharing and funds paid by HHS on behalf of low-income members. The Incurred Claims PMPM in Worksheet 2, Section III account for these as well as both Risk Adjustment and Reinsurance transfers (net of fees for these programs). As such, we would not expect these values to match.

The following warning alerts appear in Worksheet 2, Section IV of the URRT:

- Plan Adjusted Index Rate PMPM: This value compared to the “Single Risk Pool Gross Premium Avg. Rate, PMPM” from Worksheet 1, Section III. The Gross Premium PMPM in Worksheet I includes the tobacco user surcharge, whereas the plan adjusted index rates are, by definition, non-tobacco amounts. As such, we would not expect these values to match.
- Total Premium (TP): This value compared to the total “Single Risk Pool Gross Premium Avg. Rate” from Worksheet 1, Section III. The total Gross Premium in Worksheet I includes the tobacco user surcharge, whereas the plan adjusted index rates are, by definition, non-tobacco amounts. As such, we would not expect these values to match.

There are warnings generated by the Validate macro for Worksheet 2 cells V65, W65, X65, Y65, AK65, AL65, and AM65. These warnings say “(Section III - Portion of above payable by HHS's funds on behalf of insured person in dollars) should be 0 for exchange plans for year 2014 and 2015.” Based on verbal guidance from CCIO, we recognize these warnings are an error in the URRT’s programming, and, consistent with CCIO’s guidance, we are ignoring these warnings.

24. RELIANCE

In preparing the Part I Unified Rate Review Template (URRT) and Part III Actuarial Memorandum, we relied on information provided by the CHA. To the extent that it is incomplete or inaccurate, the contents of the URRT and Actuarial Memorandum, along with many of the conclusions, may be materially affected.

We performed a limited review of the data used directly in the analysis for reasonableness and consistency and have not found material defects in the data. If there are material defects in the data, it is possible that they would be uncovered by a detailed, systematic review and comparison of the data to search for data values that are questionable or for relationships that are materially inconsistent. Such a review was beyond the scope of the assignment.

A data reliance letter is attached to this rate submission.

25. ACTUARIAL CERTIFICATION

I am a Principal and Consulting Actuary with the firm of Milliman, Inc. I am a member of the American Academy of Actuaries and I meet its Qualification Standards to render the actuarial opinion contained herein. This filing is prepared on behalf of Community Health Alliance Mutual Insurance Company.

I certify to the best of my knowledge and judgment:

1. The projected index rate is:
 - In compliance with all applicable State and Federal Statutes and Regulations (45 CFR 156.80(d)(1)),
 - Developed in compliance with the applicable Actuarial Standards of Practice,

- Reasonable in relation to the benefits provided and the population anticipated to be covered, and
 - Neither excessive nor deficient based on my best estimates of the 2016 individual market.
2. 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.
 3. The percent of total premium that represents essential health benefits included in Worksheet 2, Sections III and IV were calculated in accordance with actuarial standards of practice.
 4. The CMS Actuarial Value Calculator was used to determine the AV Metal Values shown in Worksheet 2, Section I of the Part I Unified Rate Review Template for all plans.
 5. The geographic rating factors reflect only differences in the costs of delivery and do not include differences for population morbidity by geographic area.

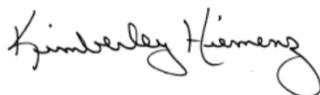
Premium rates are established in accordance with generally accepted actuarial principles and the applicable Actuarial Standards of Practice. As originally filed, they were not excessive, inadequate, or unfairly discriminatory, and reasonable in relationship to the benefits provided. The State of Tennessee required CHA to improve its capital and surplus position and the increase in premium rates was accepted by the State of Tennessee as part of the improvement plan. The profit margin and overall rate level included in this filing were provided to us by CHA to improve its capital and surplus position as required by the State of Tennessee and were not developed by Milliman. By re-submitting this filing at the specific request and direction of the State of Tennessee and CHA, Milliman is not opining on the reasonableness of the rates.

The Part I Unified Rate Review Template (URRT) does not demonstrate the process used to develop proposed premium rates. It is representative of 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 the index rate is developed in accordance with Federal regulation and used consistently and only adjusted by the allowable modifiers.

The information provided in this Actuarial Memorandum is in support of the items illustrated in the URRT and does not provide an actuarial opinion regarding the process used to develop propose premium rates. It does certify rates were developed in accordance with applicable regulations, as noted.

Differences between the projections and actual amounts depend on the extent to which future experience conforms to the assumptions made for this analysis. It is certain actual experience will not conform exactly to the assumptions used in this analysis. Actual amounts will differ from projected amounts to the extent that actual experience deviates from expected experience.

Respectfully Submitted,



Kimberley K. Hiemenz, FSA, MAAA
Principal and Consulting Actuary, Milliman
October 9, 2015

EXHIBITS

Exhibit 1
Community Health Alliance Mutual Insurance Company
2016 Individual Rate Filing
Estimated Impact of the Federal Transitional Reinsurance Program

Item	Amount	Annotation
Percentage of annual claims in excess of \$90,000		(1)
Percentage of annual claims in excess of \$250,000		(2)
Average annual claim size in excess of \$90,000		(3)
Average annual claim size in excess of \$250,000		(4)
Annual reinsurance payments requested per member		(5) = 50% of (1) x (3) - (2) x (4)
Annual reinsurance payments requested PMPM	17.90	(6) = (5)/12
Annual reinsurance payments received PMPM	17.90	(7) = 100% of (6)
Less Reinsurance Premiums Paid	2.25	(8)
Reinsurance Recoveries Net of Reinsurance Premium PMPM	\$15.65	(7) - (8)

Exhibit 2
Community Health Alliance Mutual Insurance Company
2016 Individual Rate Filing
Net Expense Factor Development

Expense Item	Amount	Per Member Per Month	Annotation
Administrative Expenses	12.12%	\$48.47	(1)
Taxes and Fees	5.53%	\$22.11	(2)
Expected Pre-Tax Profit	5.69%	\$22.74	(3)
Total Expenses	23.34%	\$93.32	(4) = (1) + (2) + (3)
Single Risk Pool Premium		\$399.86	(5)
Exchange Fee Expenses			(6)
Expenses Excluding Exchange Fees			(7) = (4) - (6)
Paid Claims		\$302.05	(8)
Market Adjustments (Paid Basis)			(9)
Paid Claims PMPM with Market Adjustments			(10) = (8) + (9)
Load to Claims for Expenses Net of Exchange Fees			(11) = (7) / (10) + 1

Exhibit 3
Community Health Alliance Mutual Insurance Company
2016 Individual Rate Filing
2016 Projected Medical Loss Ratio

	Amount PMPM	Annotation
Claims	\$302.05	(1)
Claim-Related Retention ¹		(2)
Transitional Recoveries (Received)	-\$17.90	(3)
Risk Adjustment Paid (Received)	\$19.99	(4)
MLR Numerator		(5) = (1) + (2) + (3) + (4)
Premiums	\$399.86	(6)
Taxes and Fees ²		(7)
Federal Income Tax	\$0.00	(8)
MLR Denominator		(9) = (6) - (7) - (8)
Projected MLR ³		(10) = (5) / (9)
¹ Quality Improvement / Health IT.		
² Taxes and fees include all ACA taxes and fees.		
³ The projected MLR does not take the Credibility Adjustment nor the Cost Share Adjustment Factor into account.		

Exhibit 4
Community Health Alliance Mutual Insurance Company
2016 Individual Rate Filing
2014 Terminated Plan Crosswalk

2014 HIOS ID	2016 HIOS ID
66842TN0030001	66842TN0050066
66842TN0030001	66842TN0050067
66842TN0030001	66842TN0050068
66842TN0030002	66842TN0050066
66842TN0030002	66842TN0050067
66842TN0030002	66842TN0050068
66842TN0030003	66842TN0050031
66842TN0030003	66842TN0050032
66842TN0030003	66842TN0050033
66842TN0030004	66842TN0050031
66842TN0030004	66842TN0050032
66842TN0030004	66842TN0050033
66842TN0030005	66842TN0050016
66842TN0030005	66842TN0050017
66842TN0030005	66842TN0050018
66842TN0030006	66842TN0050051
66842TN0030006	66842TN0050052
66842TN0030006	66842TN0050053
66842TN0030007	66842TN0050041
66842TN0030007	66842TN0050042
66842TN0030007	66842TN0050043
66842TN0030008	66842TN0050051
66842TN0030008	66842TN0050052
66842TN0030008	66842TN0050053
66842TN0030009	66842TN0050016
66842TN0030009	66842TN0050017
66842TN0030009	66842TN0050018
66842TN0030009	66842TN0050019
66842TN0030009	66842TN0050020
66842TN0030010	66842TN0050031
66842TN0030010	66842TN0050032
66842TN0030010	66842TN0050033
66842TN0030010	66842TN0050034
66842TN0030010	66842TN0050035
66842TN0030018	66842TN0050071
66842TN0030018	66842TN0050072
66842TN0030018	66842TN0050073
66842TN0030018	66842TN0050074
66842TN0030018	66842TN0050075
66842TN0030011	Terminated
66842TN0030012	Terminated
66842TN0030013	Terminated
66842TN0030014	Terminated
66842TN0030015	Terminated
66842TN0030016	Terminated
66842TN0030017	Terminated

RELIANCE LETTER

May 9, 2015

Mrs. Kimberley K. Hiemenz, FSA, MAAA
Principal and Consulting Actuary
Milliman, Inc.
15800 Bluemound Road - Suite 100
Brookfield, WI 53005-6069

Re: Community Health Alliance Mutual Insurance Company's 2016 Individual and Small Group Pricing

Dear Kim:

I, Lynda Johnson, ASA, MAAA Director of Product Development and Chief Actuary at Community Health Alliance Mutual Insurance Company (CHA), hereby affirm the data sources, assumptions, and information identified below and provided to Milliman, Inc. were prepared under my direction, and these items relied upon are to the best of my knowledge accurate and complete. Finally, I affirm all information that affects the 2016 individual and small group premium rate development has been given to you, and I have disclosed all items of which I am aware that would have a material impact on the rate projections.

The information provided includes:

1. Benefit plans for the individual and small group products CHA intends to offer in 2016,
2. Product name, product ID, and plan name as entered in the Health Insurance Oversight System (HIOS) for each benefit plan,
3. A crosswalk from 2014 to 2016 for those plans adhering to CMS's auto-enrollment process,
4. Product IDs and plan IDs are complaint with Federal regulations,
5. Projected administrative expenses and target profit,
6. Projected 2016 enrollment in total, by Tennessee rating region, and by network,
7. 2015 open enrollment membership information,
8. 2014 claims, premium, Cost-Sharing Reduction subsidy, Federal Reinsurance, Federal Risk Adjustment, and membership experience for CHA's individual and small group plans,
9. Guidance on appropriate medical trend factors for CHA,
10. Expected provider reimbursement rates by rating region,
11. Expected mix of provider usage by Tennessee rating region,
12. Expected utilization rates for certain service categories,

MAY 9, 2015

13. Confirmation CHA does not expect to pay Minimum Loss Ratio rebates in the 2014 individual or small group markets,
14. Assurance CHA has accurately entered plan designs into the PBT and other Federal forms and has found no meaningful discrepancies in the Actuarial Value calculations, and
15. Other information provided by CHA in various meetings, phone calls, emails, and other correspondence.

May 9, 2015

Date



Ms. Lynda Johnson, ASA, MAAA
Director of Product Development and
Chief Actuary
Community Health Alliance

APPENDICES

Appendix A
Community Health Alliance Mutual Insurance Company
Development of Paid to Allowed

Plan Name	HIOS Plan ID	Metal Tier	Plan Membership	Allowed Claims	Paid Claims	Actuarial Value
Community Health Choice A Silver 10	66842TN0050001	Silver				
Community Health Choice A Silver 11	66842TN0050006	Silver				
Community Health Choice A Silver 12	66842TN0050011	Silver				
Community Health Choice A Silver 13	66842TN0050016	Silver				
Community Health Choice A Silver 14	66842TN0050021	Silver				
Community Health Choice A Silver 15	66842TN0050026	Silver				
Community Health Choice A Silver 16	66842TN0050031	Silver				
Community Health Choice A Silver 17	66842TN0050036	Silver				
CO-OPtions Community Health Choice A Silver 18, A Multi-State Plan	66842TN0050086	Silver				
Community Health Choice A Silver 19	66842TN0050076	Silver				
Community Health Choice A Silver 30	66842TN0050117	Silver				
Community Health Choice A Bronze 10	66842TN0050041	Bronze				
Community Health Choice A Bronze 11	66842TN0050046	Bronze				
Community Health Choice A Bronze 12	66842TN0050051	Bronze				
Community Health Choice A Bronze 13	66842TN0050056	Bronze				
Community Health Choice A Bronze 14	66842TN0050061	Bronze				
Community Health Choice A Bronze 15	66842TN0050081	Bronze				
Community Health Choice A Gold 10	66842TN0050066	Gold				
CO-OPtions Community Health Choice A Gold 11, A Multi-State Plan	66842TN0050091	Gold				
Community Health Choice A Gold 12	66842TN0050071	Gold				
Community Health Choice B Silver 10	66842TN0050002	Silver				
Community Health Choice B Silver 11	66842TN0050007	Silver				
Community Health Choice B Silver 12	66842TN0050012	Silver				
Community Health Choice B Silver 13	66842TN0050017	Silver				
Community Health Choice B Silver 14	66842TN0050022	Silver				
Community Health Choice B Silver 15	66842TN0050027	Silver				
Community Health Choice B Silver 16	66842TN0050032	Silver				
Community Health Choice B Silver 17	66842TN0050037	Silver				
CO-OPtions Community Health Choice B Silver 18, A Multi-State Plan	66842TN0050087	Silver				
Community Health Choice B Silver 19	66842TN0050077	Silver				
Community Health Choice B Silver 30	66842TN0050118	Silver				
Community Health Choice B Bronze 10	66842TN0050042	Bronze				
Community Health Choice B Bronze 11	66842TN0050047	Bronze				
Community Health Choice B Bronze 12	66842TN0050052	Bronze				
Community Health Choice B Bronze 13	66842TN0050057	Bronze				
Community Health Choice B Bronze 14	66842TN0050062	Bronze				
Community Health Choice B Bronze 15	66842TN0050082	Bronze				
Community Health Choice B Gold 10	66842TN0050067	Gold				
CO-OPtions Community Health Choice B Gold 11, A Multi-State Plan	66842TN0050092	Gold				
Community Health Choice B Gold 12	66842TN0050072	Gold				

Appendix A
Community Health Alliance Mutual Insurance Company
Development of Paid to Allowed

Plan Name	HIOS Plan ID	Metal Tier	Plan Membership	Allowed Claims	Paid Claims	Actuarial Value
Community Health Choice C Silver 10	66842TN0050003	Silver				
Community Health Choice C Silver 11	66842TN0050008	Silver				
Community Health Choice C Silver 12	66842TN0050013	Silver				
Community Health Choice C Silver 13	66842TN0050018	Silver				
Community Health Choice C Silver 14	66842TN0050023	Silver				
Community Health Choice C Silver 15	66842TN0050028	Silver				
Community Health Choice C Silver 16	66842TN0050033	Silver				
Community Health Choice C Silver 17	66842TN0050038	Silver				
CO-OPtions Community Health Choice C Silver 18, A Multi-State Plan	66842TN0050088	Silver				
Community Health Choice C Silver 19	66842TN0050078	Silver				
Community Health Choice C Silver 30	66842TN0050119	Silver				
Community Health Choice C Bronze 10	66842TN0050043	Bronze				
Community Health Choice C Bronze 11	66842TN0050048	Bronze				
Community Health Choice C Bronze 12	66842TN0050053	Bronze				
Community Health Choice C Bronze 13	66842TN0050058	Bronze				
Community Health Choice C Bronze 14	66842TN0050063	Bronze				
Community Health Choice C Bronze 15	66842TN0050083	Bronze				
Community Health Choice C Gold 10	66842TN0050068	Gold				
CO-OPtions Community Health Choice C Gold 11, A Multi-State Plan	66842TN0050093	Gold				
Community Health Choice C Gold 12	66842TN0050073	Gold				
Community Health Select Nash Silver 10	66842TN0050004	Silver				
Community Health Select Nash Silver 11	66842TN0050009	Silver				
Community Health Select Nash Silver 12	66842TN0050014	Silver				
Community Health Select Nash Silver 13	66842TN0050019	Silver				
Community Health Select Nash Silver 14	66842TN0050024	Silver				
Community Health Select Nash Silver 15	66842TN0050029	Silver				
Community Health Select Nash Silver 16	66842TN0050034	Silver				
Community Health Select Nash Silver 17	66842TN0050039	Silver				
Community Health Select Nash Silver 19	66842TN0050079	Silver				
Community Health Select Nash Silver 30	66842TN0050120	Silver				
Community Health Select Nash Bronze 10	66842TN0050044	Bronze				
Community Health Select Nash Bronze 11	66842TN0050049	Bronze				
Community Health Select Nash Bronze 12	66842TN0050054	Bronze				
Community Health Select Nash Bronze 13	66842TN0050059	Bronze				
Community Health Select Nash Bronze 14	66842TN0050064	Bronze				
Community Health Select Nash Bronze 15	66842TN0050084	Bronze				
Community Health Select Nash Gold 10	66842TN0050069	Gold				
Community Health Select Nash Gold 12	66842TN0050074	Gold				
Community Health Select Memphis Silver 10	66842TN0050005	Silver				
Community Health Select Memphis Silver 11	66842TN0050010	Silver				

**Appendix A
Community Health Alliance Mutual Insurance Company
Development of Paid to Allowed**

Plan Name	HIOS Plan ID	Metal Tier	Plan Membership	Allowed Claims	Paid Claims	Actuarial Value
Community Health Select Memphis Silver 12	66842TN0050015	Silver				
Community Health Select Memphis Silver 13	66842TN0050020	Silver				
Community Health Select Memphis Silver 14	66842TN0050025	Silver				
Community Health Select Memphis Silver 15	66842TN0050030	Silver				
Community Health Select Memphis Silver 16	66842TN0050035	Silver				
Community Health Select Memphis Silver 17	66842TN0050040	Silver				
Community Health Select Memphis Silver 19	66842TN0050080	Silver				
Community Health Select Memphis Silver 30	66842TN0050121	Silver				
Community Health Select Memphis Bronze 10	66842TN0050045	Bronze				
Community Health Select Memphis Bronze 11	66842TN0050050	Bronze				
Community Health Select Memphis Bronze 12	66842TN0050055	Bronze				
Community Health Select Memphis Bronze 13	66842TN0050060	Bronze				
Community Health Select Memphis Bronze 14	66842TN0050065	Bronze				
Community Health Select Memphis Bronze 15	66842TN0050085	Bronze				
Community Health Select Memphis Gold 10	66842TN0050070	Gold				
Community Health Select Memphis Gold 12	66842TN0050075	Gold				
Community Health Select Knoxville Silver 10	66842TN0050100	Silver				
Community Health Select Knoxville Silver 11	66842TN0050101	Silver				
Community Health Select Knoxville Silver 12	66842TN0050102	Silver				
Community Health Select Knoxville Silver 13	66842TN0050103	Silver				
Community Health Select Knoxville Silver 14	66842TN0050104	Silver				
Community Health Select Knoxville Silver 15	66842TN0050105	Silver				
Community Health Select Knoxville Silver 16	66842TN0050106	Silver				
Community Health Select Knoxville Silver 17	66842TN0050107	Silver				
Community Health Select Knoxville Silver 19	66842TN0050115	Silver				
Community Health Select Knoxville Silver 30	66842TN0050122	Silver				
Community Health Select Knoxville Bronze 10	66842TN0050108	Bronze				
Community Health Select Knoxville Bronze 11	66842TN0050109	Bronze				
Community Health Select Knoxville Bronze 12	66842TN0050110	Bronze				
Community Health Select Knoxville Bronze 13	66842TN0050111	Bronze				
Community Health Select Knoxville Bronze 14	66842TN0050112	Bronze				
Community Health Select Knoxville Bronze 15	66842TN0050116	Bronze				
Community Health Select Knoxville Gold 10	66842TN0050113	Gold				
Community Health Select Knoxville Gold 12	66842TN0050114	Gold				
Total						

Appendix B
Community Health Alliance Mutual Insurance Company
Development of Plan Adjusted Index Rate

Plan Name	HIOS Plan ID	Market Adjusted Index Rate	AV & Cost Sharing	Provider Network Adjustment	Benefits In Addition to Catastrophic EHBs Adjustment	Administrative Costs Excl. Exchange Fee	Plan Adjusted Index Rate
Community Health Choice A Silver 10	66842TN0050001						\$485.82
Community Health Choice A Silver 11	66842TN0050006						\$494.31
Community Health Choice A Silver 12	66842TN0050011						\$483.50
Community Health Choice A Silver 13	66842TN0050016						\$493.54
Community Health Choice A Silver 14	66842TN0050021						\$529.47
Community Health Choice A Silver 15	66842TN0050026						\$421.69
Community Health Choice A Silver 16	66842TN0050031						\$480.02
Community Health Choice A Silver 17	66842TN0050036						\$447.96
CO-OPtions Community Health Choice A Silver 18, A Multi-State Plan	66842TN0050086						\$541.46
Community Health Choice A Silver 19	66842TN0050076						\$502.81
Community Health Choice A Silver 30	66842TN0050117						\$427.10
Community Health Choice A Bronze 10	66842TN0050041						\$371.00
Community Health Choice A Bronze 11	66842TN0050046						\$374.00
Community Health Choice A Bronze 12	66842TN0050051						\$327.34
Community Health Choice A Bronze 13	66842TN0050056						\$405.04
Community Health Choice A Bronze 14	66842TN0050061						\$391.72
Community Health Choice A Bronze 15	66842TN0050081						\$358.42
Community Health Choice A Gold 10	66842TN0050066						\$637.06
CO-OPtions Community Health Choice A Gold 11, A Multi-State Plan	66842TN0050091						\$677.20
Community Health Choice A Gold 12	66842TN0050071						\$585.69
Community Health Choice B Silver 10	66842TN0050002						\$482.58
Community Health Choice B Silver 11	66842TN0050007						\$491.02
Community Health Choice B Silver 12	66842TN0050012						\$480.28
Community Health Choice B Silver 13	66842TN0050017						\$490.25
Community Health Choice B Silver 14	66842TN0050022						\$525.94
Community Health Choice B Silver 15	66842TN0050027						\$418.88
Community Health Choice B Silver 16	66842TN0050032						\$476.82
Community Health Choice B Silver 17	66842TN0050037						\$444.98
CO-OPtions Community Health Choice B Silver 18, A Multi-State Plan	66842TN0050087						\$537.85
Community Health Choice B Silver 19	66842TN0050077						\$499.46
Community Health Choice B Silver 30	66842TN0050118						\$424.25
Community Health Choice B Bronze 10	66842TN0050042						\$371.00
Community Health Choice B Bronze 11	66842TN0050047						\$374.00
Community Health Choice B Bronze 12	66842TN0050052						\$327.34
Community Health Choice B Bronze 13	66842TN0050057						\$405.04
Community Health Choice B Bronze 14	66842TN0050062						\$391.72
Community Health Choice B Bronze 15	66842TN0050082						\$358.42
Community Health Choice B Gold 10	66842TN0050067						\$637.06
CO-OPtions Community Health Choice B Gold 11, A Multi-State Plan	66842TN0050092						\$677.20
Community Health Choice B Gold 12	66842TN0050072						\$585.69
Community Health Choice C Silver 10	66842TN0050003						\$482.58
Community Health Choice C Silver 11	66842TN0050008						\$491.02
Community Health Choice C Silver 12	66842TN0050013						\$480.28

Appendix B
Community Health Alliance Mutual Insurance Company
Development of Plan Adjusted Index Rate

Plan Name	HIOS Plan ID	Market Adjusted Index Rate	AV & Cost Sharing	Provider Network Adjustment	Benefits In Addition to Catastrophic EHBs Adjustment	Administrative Costs Excl. Exchange Fee	Plan Adjusted Index Rate
Community Health Choice C Silver 13	66842TN0050018						\$490.25
Community Health Choice C Silver 14	66842TN0050023						\$525.94
Community Health Choice C Silver 15	66842TN0050028						\$418.88
Community Health Choice C Silver 16	66842TN0050033						\$476.82
Community Health Choice C Silver 17	66842TN0050038						\$444.98
CO-OPtions Community Health Choice C Silver 18, A Multi-State Pla	66842TN0050088						\$537.85
Community Health Choice C Silver 19	66842TN0050078						\$499.46
Community Health Choice C Silver 30	66842TN0050119						\$424.25
Community Health Choice C Bronze 10	66842TN0050043						\$371.00
Community Health Choice C Bronze 11	66842TN0050048						\$374.00
Community Health Choice C Bronze 12	66842TN0050053						\$327.34
Community Health Choice C Bronze 13	66842TN0050058						\$405.04
Community Health Choice C Bronze 14	66842TN0050063						\$391.72
Community Health Choice C Bronze 15	66842TN0050083						\$358.42
Community Health Choice C Gold 10	66842TN0050068						\$637.06
CO-OPtions Community Health Choice C Gold 11, A Multi-State Plan	66842TN0050093						\$677.20
Community Health Choice C Gold 12	66842TN0050073						\$585.69
Community Health Select Nash Silver 10	66842TN0050004						\$411.00
Community Health Select Nash Silver 11	66842TN0050009						\$418.19
Community Health Select Nash Silver 12	66842TN0050014						\$409.04
Community Health Select Nash Silver 13	66842TN0050019						\$417.54
Community Health Select Nash Silver 14	66842TN0050024						\$447.93
Community Health Select Nash Silver 15	66842TN0050029						\$356.76
Community Health Select Nash Silver 16	66842TN0050034						\$406.10
Community Health Select Nash Silver 17	66842TN0050039						\$378.98
Community Health Select Nash Silver 19	66842TN0050079						\$425.38
Community Health Select Nash Silver 30	66842TN0050120						\$361.33
Community Health Select Nash Bronze 10	66842TN0050044						\$318.08
Community Health Select Nash Bronze 11	66842TN0050049						\$320.65
Community Health Select Nash Bronze 12	66842TN0050054						\$280.65
Community Health Select Nash Bronze 13	66842TN0050059						\$347.27

Appendix B
Community Health Alliance Mutual Insurance Company
Development of Plan Adjusted Index Rate

Plan Name	HIOS Plan ID	Market Adjusted Index Rate	AV & Cost Sharing	Provider Network Adjustment	Benefits In Addition to Catastrophic EHBs Adjustment	Administrative Costs Excl. Exchange Fee	Plan Adjusted Index Rate
Community Health Select Nash Bronze 14	66842TN0050064						\$335.85
Community Health Select Nash Bronze 15	66842TN0050084						\$307.30
Community Health Select Nash Gold 10	66842TN0050069						\$546.18
Community Health Select Nash Gold 12	66842TN0050074						\$502.14
Community Health Select Memphis Silver 10	66842TN0050005						\$435.48
Community Health Select Memphis Silver 11	66842TN0050010						\$443.10
Community Health Select Memphis Silver 12	66842TN0050015						\$433.40
Community Health Select Memphis Silver 13	66842TN0050020						\$442.40
Community Health Select Memphis Silver 14	66842TN0050025						\$474.61
Community Health Select Memphis Silver 15	66842TN0050030						\$378.00
Community Health Select Memphis Silver 16	66842TN0050035						\$430.29
Community Health Select Memphis Silver 17	66842TN0050040						\$401.55
Community Health Select Memphis Silver 19	66842TN0050080						\$450.71
Community Health Select Memphis Silver 30	66842TN0050121						\$382.85
Community Health Select Memphis Bronze 10	66842TN0050045						\$334.80
Community Health Select Memphis Bronze 11	66842TN0050050						\$337.50
Community Health Select Memphis Bronze 12	66842TN0050055						\$295.40
Community Health Select Memphis Bronze 13	66842TN0050060						\$365.51
Community Health Select Memphis Bronze 14	66842TN0050065						\$353.49
Community Health Select Memphis Bronze 15	66842TN0050085						\$323.44
Community Health Select Memphis Gold 10	66842TN0050070						\$574.88
Community Health Select Memphis Gold 12	66842TN0050075						\$528.52
Community Health Select Knoxville Silver 10	66842TN0050100						\$450.06
Community Health Select Knoxville Silver 11	66842TN0050101						\$457.93
Community Health Select Knoxville Silver 12	66842TN0050102						\$447.91
Community Health Select Knoxville Silver 13	66842TN0050103						\$457.21
Community Health Select Knoxville Silver 14	66842TN0050104						\$490.49
Community Health Select Knoxville Silver 15	66842TN0050105						\$390.65
Community Health Select Knoxville Silver 16	66842TN0050106						\$444.69
Community Health Select Knoxville Silver 17	66842TN0050107						\$414.99
Community Health Select Knoxville Silver 19	66842TN0050115						\$465.80
Community Health Select Knoxville Silver 30	66842TN0050122						\$395.66
Community Health Select Knoxville Bronze 10	66842TN0050108						\$350.61
Community Health Select Knoxville Bronze 11	66842TN0050109						\$353.44
Community Health Select Knoxville Bronze 12	66842TN0050110						\$309.35
Community Health Select Knoxville Bronze 13	66842TN0050111						\$382.78
Community Health Select Knoxville Bronze 14	66842TN0050112						\$370.19
Community Health Select Knoxville Bronze 15	66842TN0050116						\$338.72
Community Health Select Knoxville Gold 10	66842TN0050113						\$602.04
Community Health Select Knoxville Gold 12	66842TN0050114						\$553.49
Total							\$385.24

Appendix C
Community Health Alliance Mutual Insurance Company
Plan Adjusted Index Rate Calibration

Plan Name	HIOS Plan ID	Plan Adjusted Index Rate	Age Calibration Factor	Geography Calibration Factor	Calibrated Plan Adjusted Index Rate
Community Health Choice A Silver 10	66842TN0050001	\$485.82			
Community Health Choice A Silver 11	66842TN0050006	\$494.31			
Community Health Choice A Silver 12	66842TN0050011	\$483.50			
Community Health Choice A Silver 13	66842TN0050016	\$493.54			
Community Health Choice A Silver 14	66842TN0050021	\$529.47			
Community Health Choice A Silver 15	66842TN0050026	\$421.69			
Community Health Choice A Silver 16	66842TN0050031	\$480.02			
Community Health Choice A Silver 17	66842TN0050036	\$447.96			
CO-OPtions Community Health Choice A Silver 18, A Multi-State Plan	66842TN0050086	\$541.46			
Community Health Choice A Silver 19	66842TN0050076	\$502.81			
Community Health Choice A Silver 30	66842TN0050117	\$427.10			
Community Health Choice A Bronze 10	66842TN0050041	\$371.00			
Community Health Choice A Bronze 11	66842TN0050046	\$374.00			
Community Health Choice A Bronze 12	66842TN0050051	\$327.34			
Community Health Choice A Bronze 13	66842TN0050056	\$405.04			
Community Health Choice A Bronze 14	66842TN0050061	\$391.72			
Community Health Choice A Bronze 15	66842TN0050081	\$358.42			
Community Health Choice A Gold 10	66842TN0050066	\$637.06			
CO-OPtions Community Health Choice A Gold 11, A Multi-State Plan	66842TN0050091	\$677.20			
Community Health Choice A Gold 12	66842TN0050071	\$585.69			
Community Health Choice B Silver 10	66842TN0050002	\$482.58			
Community Health Choice B Silver 11	66842TN0050007	\$491.02			
Community Health Choice B Silver 12	66842TN0050012	\$480.28			
Community Health Choice B Silver 13	66842TN0050017	\$490.25			
Community Health Choice B Silver 14	66842TN0050022	\$525.94			
Community Health Choice B Silver 15	66842TN0050027	\$418.88			
Community Health Choice B Silver 16	66842TN0050032	\$476.82			
Community Health Choice B Silver 17	66842TN0050037	\$444.98			
CO-OPtions Community Health Choice B Silver 18, A Multi-State Plan	66842TN0050087	\$537.85			
Community Health Choice B Silver 19	66842TN0050077	\$499.46			
Community Health Choice B Silver 30	66842TN0050118	\$424.25			
Community Health Choice B Bronze 10	66842TN0050042	\$371.00			
Community Health Choice B Bronze 11	66842TN0050047	\$374.00			
Community Health Choice B Bronze 12	66842TN0050052	\$327.34			

Appendix C
Community Health Alliance Mutual Insurance Company
Plan Adjusted Index Rate Calibration

Plan Name	HIOS Plan ID	Plan Adjusted Index Rate	Age Calibration Factor	Geography Calibration Factor	Calibrated Plan Adjusted Index Rate
Community Health Choice B Bronze 13	66842TN0050057	\$405.04			
Community Health Choice B Bronze 14	66842TN0050062	\$391.72			
Community Health Choice B Bronze 15	66842TN0050082	\$358.42			
Community Health Choice B Gold 10	66842TN0050067	\$637.06			
CO-OPtions Community Health Choice B Gold 11, A Multi-State Plan	66842TN0050092	\$677.20			
Community Health Choice B Gold 12	66842TN0050072	\$585.69			
Community Health Choice C Silver 10	66842TN0050003	\$482.58			
Community Health Choice C Silver 11	66842TN0050008	\$491.02			
Community Health Choice C Silver 12	66842TN0050013	\$480.28			
Community Health Choice C Silver 13	66842TN0050018	\$490.25			
Community Health Choice C Silver 14	66842TN0050023	\$525.94			
Community Health Choice C Silver 15	66842TN0050028	\$418.88			
Community Health Choice C Silver 16	66842TN0050033	\$476.82			
Community Health Choice C Silver 17	66842TN0050038	\$444.98			
CO-OPtions Community Health Choice C Silver 18, A Multi-State Plan	66842TN0050088	\$537.85			
Community Health Choice C Silver 19	66842TN0050078	\$499.46			
Community Health Choice C Silver 30	66842TN0050119	\$424.25			
Community Health Choice C Bronze 10	66842TN0050043	\$371.00			
Community Health Choice C Bronze 11	66842TN0050048	\$374.00			
Community Health Choice C Bronze 12	66842TN0050053	\$327.34			
Community Health Choice C Bronze 13	66842TN0050058	\$405.04			
Community Health Choice C Bronze 14	66842TN0050063	\$391.72			
Community Health Choice C Bronze 15	66842TN0050083	\$358.42			
Community Health Choice C Gold 10	66842TN0050068	\$637.06			
CO-OPtions Community Health Choice C Gold 11, A Multi-State Plan	66842TN0050093	\$677.20			
Community Health Choice C Gold 12	66842TN0050073	\$585.69			
Community Health Select Nash Silver 10	66842TN0050004	\$411.00			
Community Health Select Nash Silver 11	66842TN0050009	\$418.19			
Community Health Select Nash Silver 12	66842TN0050014	\$409.04			
Community Health Select Nash Silver 13	66842TN0050019	\$417.54			
Community Health Select Nash Silver 14	66842TN0050024	\$447.93			
Community Health Select Nash Silver 15	66842TN0050029	\$356.76			
Community Health Select Nash Silver 16	66842TN0050034	\$406.10			
Community Health Select Nash Silver 17	66842TN0050039	\$378.98			

Appendix C
Community Health Alliance Mutual Insurance Company
Plan Adjusted Index Rate Calibration

Plan Name	HIOS Plan ID	Plan Adjusted Index Rate	Age Calibration Factor	Geography Calibration Factor	Calibrated Plan Adjusted Index Rate
Community Health Select Nash Silver 19	66842TN0050079	\$425.38			
Community Health Select Nash Silver 30	66842TN0050120	\$361.33			
Community Health Select Nash Bronze 10	66842TN0050044	\$318.08			
Community Health Select Nash Bronze 11	66842TN0050049	\$320.65			
Community Health Select Nash Bronze 12	66842TN0050054	\$280.65			
Community Health Select Nash Bronze 13	66842TN0050059	\$347.27			
Community Health Select Nash Bronze 14	66842TN0050064	\$335.85			
Community Health Select Nash Bronze 15	66842TN0050084	\$307.30			
Community Health Select Nash Gold 10	66842TN0050069	\$546.18			
Community Health Select Nash Gold 12	66842TN0050074	\$502.14			
Community Health Select Memphis Silver 10	66842TN0050005	\$435.48			
Community Health Select Memphis Silver 11	66842TN0050010	\$443.10			
Community Health Select Memphis Silver 12	66842TN0050015	\$433.40			
Community Health Select Memphis Silver 13	66842TN0050020	\$442.40			
Community Health Select Memphis Silver 14	66842TN0050025	\$474.61			
Community Health Select Memphis Silver 15	66842TN0050030	\$378.00			
Community Health Select Memphis Silver 16	66842TN0050035	\$430.29			
Community Health Select Memphis Silver 17	66842TN0050040	\$401.55			
Community Health Select Memphis Silver 19	66842TN0050080	\$450.71			
Community Health Select Memphis Silver 30	66842TN0050121	\$382.85			
Community Health Select Memphis Bronze 10	66842TN0050045	\$334.80			
Community Health Select Memphis Bronze 11	66842TN0050050	\$337.50			
Community Health Select Memphis Bronze 12	66842TN0050055	\$295.40			
Community Health Select Memphis Bronze 13	66842TN0050060	\$365.51			
Community Health Select Memphis Bronze 14	66842TN0050065	\$353.49			
Community Health Select Memphis Bronze 15	66842TN0050085	\$323.44			
Community Health Select Memphis Gold 10	66842TN0050070	\$574.88			
Community Health Select Memphis Gold 12	66842TN0050075	\$528.52			
Community Health Select Knoxville Silver 10	66842TN0050100	\$450.06			
Community Health Select Knoxville Silver 11	66842TN0050101	\$457.93			
Community Health Select Knoxville Silver 12	66842TN0050102	\$447.91			
Community Health Select Knoxville Silver 13	66842TN0050103	\$457.21			
Community Health Select Knoxville Silver 14	66842TN0050104	\$490.49			
Community Health Select Knoxville Silver 15	66842TN0050105	\$390.65			

Appendix C
Community Health Alliance Mutual Insurance Company
Plan Adjusted Index Rate Calibration

Plan Name	HIOS Plan ID	Plan Adjusted Index Rate	Age Calibration Factor	Geography Calibration Factor	Calibrated Plan Adjusted Index Rate
Community Health Select Knoxville Silver 16	66842TN0050106	\$444.69			
Community Health Select Knoxville Silver 17	66842TN0050107	\$414.99			
Community Health Select Knoxville Silver 19	66842TN0050115	\$465.80			
Community Health Select Knoxville Silver 30	66842TN0050122	\$395.66			
Community Health Select Knoxville Bronze 10	66842TN0050108	\$350.61			
Community Health Select Knoxville Bronze 11	66842TN0050109	\$353.44			
Community Health Select Knoxville Bronze 12	66842TN0050110	\$309.35			
Community Health Select Knoxville Bronze 13	66842TN0050111	\$382.78			
Community Health Select Knoxville Bronze 14	66842TN0050112	\$370.19			
Community Health Select Knoxville Bronze 15	66842TN0050116	\$338.72			
Community Health Select Knoxville Gold 10	66842TN0050113	\$602.04			
Community Health Select Knoxville Gold 12	66842TN0050114	\$553.49			
Total		\$385.24			

Appendix D
Community Health Alliance Mutual Insurance Company
Index Rate to Consumer Adjusted Index Rate

Plan Name	HIOS Plan ID	Index Rate	Market Adjusted Index Rate	Plan Adjusted Index Rate	Consumer Adjusted Index Rate
Community Health Choice A Silver 10	66842TN0050001	\$457.55		\$485.82	
Community Health Choice A Silver 11	66842TN0050006	\$457.55		\$494.31	
Community Health Choice A Silver 12	66842TN0050011	\$457.55		\$483.50	
Community Health Choice A Silver 13	66842TN0050016	\$457.55		\$493.54	
Community Health Choice A Silver 14	66842TN0050021	\$457.55		\$529.47	
Community Health Choice A Silver 15	66842TN0050026	\$457.55		\$421.69	
Community Health Choice A Silver 16	66842TN0050031	\$457.55		\$480.02	
Community Health Choice A Silver 17	66842TN0050036	\$457.55		\$447.96	
CO-OPtions Community Health Choice A Silver 18, A Multi-State Plan	66842TN0050086	\$457.55		\$541.46	
Community Health Choice A Silver 19	66842TN0050076	\$457.55		\$502.81	
Community Health Choice A Silver 30	66842TN0050117	\$457.55		\$427.10	
Community Health Choice A Bronze 10	66842TN0050041	\$457.55		\$371.00	
Community Health Choice A Bronze 11	66842TN0050046	\$457.55		\$374.00	
Community Health Choice A Bronze 12	66842TN0050051	\$457.55		\$327.34	
Community Health Choice A Bronze 13	66842TN0050056	\$457.55		\$405.04	
Community Health Choice A Bronze 14	66842TN0050061	\$457.55		\$391.72	
Community Health Choice A Bronze 15	66842TN0050081	\$457.55		\$358.42	
Community Health Choice A Gold 10	66842TN0050066	\$457.55		\$637.06	
CO-OPtions Community Health Choice A Gold 11, A Multi-State Plan	66842TN0050091	\$457.55		\$677.20	
Community Health Choice A Gold 12	66842TN0050071	\$457.55		\$585.69	
Community Health Choice B Silver 10	66842TN0050002	\$457.55		\$482.58	
Community Health Choice B Silver 11	66842TN0050007	\$457.55		\$491.02	
Community Health Choice B Silver 12	66842TN0050012	\$457.55		\$480.28	
Community Health Choice B Silver 13	66842TN0050017	\$457.55		\$490.25	
Community Health Choice B Silver 14	66842TN0050022	\$457.55		\$525.94	
Community Health Choice B Silver 15	66842TN0050027	\$457.55		\$418.88	
Community Health Choice B Silver 16	66842TN0050032	\$457.55		\$476.82	
Community Health Choice B Silver 17	66842TN0050037	\$457.55		\$444.98	
CO-OPtions Community Health Choice B Silver 18, A Multi-State Plan	66842TN0050087	\$457.55		\$537.85	
Community Health Choice B Silver 19	66842TN0050077	\$457.55		\$499.46	
Community Health Choice B Silver 30	66842TN0050118	\$457.55		\$424.25	
Community Health Choice B Bronze 10	66842TN0050042	\$457.55		\$371.00	
Community Health Choice B Bronze 11	66842TN0050047	\$457.55		\$374.00	
Community Health Choice B Bronze 12	66842TN0050052	\$457.55		\$327.34	

Appendix D
Community Health Alliance Mutual Insurance Company
Index Rate to Consumer Adjusted Index Rate

Plan Name	HIOS Plan ID	Index Rate	Market Adjusted Index Rate	Plan Adjusted Index Rate	Consumer Adjusted Index Rate
Community Health Choice B Bronze 13	66842TN0050057	\$457.55		\$405.04	
Community Health Choice B Bronze 14	66842TN0050062	\$457.55		\$391.72	
Community Health Choice B Bronze 15	66842TN0050082	\$457.55		\$358.42	
Community Health Choice B Gold 10	66842TN0050067	\$457.55		\$637.06	
CO-OPTIONS Community Health Choice B Gold 11, A Multi-State Plan	66842TN0050092	\$457.55		\$677.20	
Community Health Choice B Gold 12	66842TN0050072	\$457.55		\$585.69	
Community Health Choice C Silver 10	66842TN0050003	\$457.55		\$482.58	
Community Health Choice C Silver 11	66842TN0050008	\$457.55		\$491.02	
Community Health Choice C Silver 12	66842TN0050013	\$457.55		\$480.28	
Community Health Choice C Silver 13	66842TN0050018	\$457.55		\$490.25	
Community Health Choice C Silver 14	66842TN0050023	\$457.55		\$525.94	
Community Health Choice C Silver 15	66842TN0050028	\$457.55		\$418.88	
Community Health Choice C Silver 16	66842TN0050033	\$457.55		\$476.82	
Community Health Choice C Silver 17	66842TN0050038	\$457.55		\$444.98	
CO-OPTIONS Community Health Choice C Silver 18, A Multi-State Plan	66842TN0050088	\$457.55		\$537.85	
Community Health Choice C Silver 19	66842TN0050078	\$457.55		\$499.46	
Community Health Choice C Silver 30	66842TN0050119	\$457.55		\$424.25	
Community Health Choice C Bronze 10	66842TN0050043	\$457.55		\$371.00	
Community Health Choice C Bronze 11	66842TN0050048	\$457.55		\$374.00	
Community Health Choice C Bronze 12	66842TN0050053	\$457.55		\$327.34	
Community Health Choice C Bronze 13	66842TN0050058	\$457.55		\$405.04	
Community Health Choice C Bronze 14	66842TN0050063	\$457.55		\$391.72	
Community Health Choice C Bronze 15	66842TN0050083	\$457.55		\$358.42	
Community Health Choice C Gold 10	66842TN0050068	\$457.55		\$637.06	
CO-OPTIONS Community Health Choice C Gold 11, A Multi-State Plan	66842TN0050093	\$457.55		\$677.20	
Community Health Choice C Gold 12	66842TN0050073	\$457.55		\$585.69	
Community Health Select Nash Silver 10	66842TN0050004	\$457.55		\$411.00	
Community Health Select Nash Silver 11	66842TN0050009	\$457.55		\$418.19	
Community Health Select Nash Silver 12	66842TN0050014	\$457.55		\$409.04	
Community Health Select Nash Silver 13	66842TN0050019	\$457.55		\$417.54	
Community Health Select Nash Silver 14	66842TN0050024	\$457.55		\$447.93	
Community Health Select Nash Silver 15	66842TN0050029	\$457.55		\$356.76	
Community Health Select Nash Silver 16	66842TN0050034	\$457.55		\$406.10	
Community Health Select Nash Silver 17	66842TN0050039	\$457.55		\$378.98	

Appendix D
Community Health Alliance Mutual Insurance Company
Index Rate to Consumer Adjusted Index Rate

Plan Name	HIOS Plan ID	Index Rate	Market Adjusted Index Rate	Plan Adjusted Index Rate	Consumer Adjusted Index Rate
Community Health Select Nash Silver 19	66842TN0050079	\$457.55		\$425.38	
Community Health Select Nash Silver 30	66842TN0050120	\$457.55		\$361.33	
Community Health Select Nash Bronze 10	66842TN0050044	\$457.55		\$318.08	
Community Health Select Nash Bronze 11	66842TN0050049	\$457.55		\$320.65	
Community Health Select Nash Bronze 12	66842TN0050054	\$457.55		\$280.65	
Community Health Select Nash Bronze 13	66842TN0050059	\$457.55		\$347.27	
Community Health Select Nash Bronze 14	66842TN0050064	\$457.55		\$335.85	
Community Health Select Nash Bronze 15	66842TN0050084	\$457.55		\$307.30	
Community Health Select Nash Gold 10	66842TN0050069	\$457.55		\$546.18	
Community Health Select Nash Gold 12	66842TN0050074	\$457.55		\$502.14	
Community Health Select Memphis Silver 10	66842TN0050005	\$457.55		\$435.48	
Community Health Select Memphis Silver 11	66842TN0050010	\$457.55		\$443.10	
Community Health Select Memphis Silver 12	66842TN0050015	\$457.55		\$433.40	
Community Health Select Memphis Silver 13	66842TN0050020	\$457.55		\$442.40	
Community Health Select Memphis Silver 14	66842TN0050025	\$457.55		\$474.61	
Community Health Select Memphis Silver 15	66842TN0050030	\$457.55		\$378.00	
Community Health Select Memphis Silver 16	66842TN0050035	\$457.55		\$430.29	
Community Health Select Memphis Silver 17	66842TN0050040	\$457.55		\$401.55	
Community Health Select Memphis Silver 19	66842TN0050080	\$457.55		\$450.71	
Community Health Select Memphis Silver 30	66842TN0050121	\$457.55		\$382.85	
Community Health Select Memphis Bronze 10	66842TN0050045	\$457.55		\$334.80	
Community Health Select Memphis Bronze 11	66842TN0050050	\$457.55		\$337.50	
Community Health Select Memphis Bronze 12	66842TN0050055	\$457.55		\$295.40	
Community Health Select Memphis Bronze 13	66842TN0050060	\$457.55		\$365.51	
Community Health Select Memphis Bronze 14	66842TN0050065	\$457.55		\$353.49	
Community Health Select Memphis Bronze 15	66842TN0050085	\$457.55		\$323.44	
Community Health Select Memphis Gold 10	66842TN0050070	\$457.55		\$574.88	
Community Health Select Memphis Gold 12	66842TN0050075	\$457.55		\$528.52	
Community Health Select Knoxville Silver 10	66842TN0050100	\$457.55		\$450.06	
Community Health Select Knoxville Silver 11	66842TN0050101	\$457.55		\$457.93	
Community Health Select Knoxville Silver 12	66842TN0050102	\$457.55		\$447.91	
Community Health Select Knoxville Silver 13	66842TN0050103	\$457.55		\$457.21	
Community Health Select Knoxville Silver 14	66842TN0050104	\$457.55		\$490.49	
Community Health Select Knoxville Silver 15	66842TN0050105	\$457.55		\$390.65	

Appendix D
Community Health Alliance Mutual Insurance Company
Index Rate to Consumer Adjusted Index Rate

Plan Name	HIOS Plan ID	Index Rate	Market Adjusted Index Rate	Plan Adjusted Index Rate	Consumer Adjusted Index Rate
Community Health Select Knoxville Silver 16	66842TN0050106	\$457.55		\$444.69	
Community Health Select Knoxville Silver 17	66842TN0050107	\$457.55		\$414.99	
Community Health Select Knoxville Silver 19	66842TN0050115	\$457.55		\$465.80	
Community Health Select Knoxville Silver 30	66842TN0050122	\$457.55		\$395.66	
Community Health Select Knoxville Bronze 10	66842TN0050108	\$457.55		\$350.61	
Community Health Select Knoxville Bronze 11	66842TN0050109	\$457.55		\$353.44	
Community Health Select Knoxville Bronze 12	66842TN0050110	\$457.55		\$309.35	
Community Health Select Knoxville Bronze 13	66842TN0050111	\$457.55		\$382.78	
Community Health Select Knoxville Bronze 14	66842TN0050112	\$457.55		\$370.19	
Community Health Select Knoxville Bronze 15	66842TN0050116	\$457.55		\$338.72	
Community Health Select Knoxville Gold 10	66842TN0050113	\$457.55		\$602.04	
Community Health Select Knoxville Gold 12	66842TN0050114	\$457.55		\$553.49	

Consumer Adjusted Index Rate is the base rate for a given plan.

The premium for a consumer is calculated as:

- Consumer Adjusted Index Rate
- x Age Factor
- x Geography Factor
- x Trend Factor

Premium Rate Example:

Community Health Choice A Silver 10 (66842TN0050001)
 Age: 21 Years Old
 Rating Area: 2
 Effective Date: January 1, 2016

Appendix E
Community Health Alliance Mutual Insurance Company
Development of AV Pricing Value

Plan Name	Plan ID	AV & Cost Sharing	Provider Network Adjustment	Benefits In Addition to EHBs	Administrative Costs Excl. Exchange Fee	Specific Catastrophic Eligibility	AV Pricing Value¹
Community Health Choice A Silver 10	66842TN0050001						1.003
Community Health Choice A Silver 11	66842TN0050006						1.020
Community Health Choice A Silver 12	66842TN0050011						0.998
Community Health Choice A Silver 13	66842TN0050016						1.019
Community Health Choice A Silver 14	66842TN0050021						1.093
Community Health Choice A Silver 15	66842TN0050026						0.870
Community Health Choice A Silver 16	66842TN0050031						0.991
Community Health Choice A Silver 17	66842TN0050036						0.925
CO-OPtions Community Health Choice A Silver 18, A Multi-State Plan	66842TN0050086						1.118
Community Health Choice A Silver 19	66842TN0050076						1.038
Community Health Choice A Silver 30	66842TN0050117						0.882
Community Health Choice A Bronze 10	66842TN0050041						0.766
Community Health Choice A Bronze 11	66842TN0050046						0.772
Community Health Choice A Bronze 12	66842TN0050051						0.676
Community Health Choice A Bronze 13	66842TN0050056						0.836
Community Health Choice A Bronze 14	66842TN0050061						0.809
Community Health Choice A Bronze 15	66842TN0050081						0.740
Community Health Choice A Gold 10	66842TN0050066						1.315
CO-OPtions Community Health Choice A Gold 11, A Multi-State Plan	66842TN0050091						1.398
Community Health Choice A Gold 12	66842TN0050071						1.209
Community Health Choice B Silver 10	66842TN0050002						0.996
Community Health Choice B Silver 11	66842TN0050007						1.013
Community Health Choice B Silver 12	66842TN0050012						0.991
Community Health Choice B Silver 13	66842TN0050017						1.012
Community Health Choice B Silver 14	66842TN0050022						1.086
Community Health Choice B Silver 15	66842TN0050027						0.865
Community Health Choice B Silver 16	66842TN0050032						0.984
Community Health Choice B Silver 17	66842TN0050037						0.918
CO-OPtions Community Health Choice B Silver 18, A Multi-State Plan	66842TN0050087						1.110
Community Health Choice B Silver 19	66842TN0050077						1.031
Community Health Choice B Silver 30	66842TN0050118						0.876
Community Health Choice B Bronze 10	66842TN0050042						0.766
Community Health Choice B Bronze 11	66842TN0050047						0.772
Community Health Choice B Bronze 12	66842TN0050052						0.676
Community Health Choice B Bronze 13	66842TN0050057						0.836
Community Health Choice B Bronze 14	66842TN0050062						0.809
Community Health Choice B Bronze 15	66842TN0050082						0.740
Community Health Choice B Gold 10	66842TN0050067						1.315
CO-OPtions Community Health Choice B Gold 11, A Multi-State Plan	66842TN0050092						1.398

Appendix E
Community Health Alliance Mutual Insurance Company
Development of AV Pricing Value

Plan Name	Plan ID	AV & Cost Sharing	Provider Network Adjustment	Benefits In Addition to EHBs	Administrative Costs Excl. Exchange Fee	Specific Catastrophic Eligibility	AV Pricing Value ¹
Community Health Choice B Gold 12	66842TN0050072						1.209
Community Health Choice C Silver 10	66842TN0050003						0.996
Community Health Choice C Silver 11	66842TN0050008						1.013
Community Health Choice C Silver 12	66842TN0050013						0.991
Community Health Choice C Silver 13	66842TN0050018						1.012
Community Health Choice C Silver 14	66842TN0050023						1.086
Community Health Choice C Silver 15	66842TN0050028						0.865
Community Health Choice C Silver 16	66842TN0050033						0.984
Community Health Choice C Silver 17	66842TN0050038						0.918
CO-OPtions Community Health Choice C Silver 18, A Multi-State Plan	66842TN0050088						1.110
Community Health Choice C Silver 19	66842TN0050078						1.031
Community Health Choice C Silver 30	66842TN0050119						0.876
Community Health Choice C Bronze 10	66842TN0050043						0.766
Community Health Choice C Bronze 11	66842TN0050048						0.772
Community Health Choice C Bronze 12	66842TN0050053						0.676
Community Health Choice C Bronze 13	66842TN0050058						0.836
Community Health Choice C Bronze 14	66842TN0050063						0.809
Community Health Choice C Bronze 15	66842TN0050083						0.740
Community Health Choice C Gold 10	66842TN0050068						1.315
CO-OPtions Community Health Choice C Gold 11, A Multi-State Plan	66842TN0050093						1.398
Community Health Choice C Gold 12	66842TN0050073						1.209
Community Health Select Nash Silver 10	66842TN0050004						0.848
Community Health Select Nash Silver 11	66842TN0050009						0.863
Community Health Select Nash Silver 12	66842TN0050014						0.844
Community Health Select Nash Silver 13	66842TN0050019						0.862
Community Health Select Nash Silver 14	66842TN0050024						0.925
Community Health Select Nash Silver 15	66842TN0050029						0.736
Community Health Select Nash Silver 16	66842TN0050034						0.838
Community Health Select Nash Silver 17	66842TN0050039						0.782
Community Health Select Nash Silver 19	66842TN0050079						0.878
Community Health Select Nash Silver 30	66842TN0050120						0.746
Community Health Select Nash Bronze 10	66842TN0050044						0.657
Community Health Select Nash Bronze 11	66842TN0050049						0.662
Community Health Select Nash Bronze 12	66842TN0050054						0.579
Community Health Select Nash Bronze 13	66842TN0050059						0.717
Community Health Select Nash Bronze 14	66842TN0050064						0.693
Community Health Select Nash Bronze 15	66842TN0050084						0.634
Community Health Select Nash Gold 10	66842TN0050069						1.127
Community Health Select Nash Gold 12	66842TN0050074						1.036

**Appendix E
Community Health Alliance Mutual Insurance Company
Development of AV Pricing Value**

Plan Name	Plan ID	AV & Cost Sharing	Provider Network Adjustment	Benefits In Addition to EHBs	Administrative Costs Excl. Exchange Fee	Specific Catastrophic Eligibility	AV Pricing Value¹
Community Health Select Memphis Silver 10	66842TN0050005						0.899
Community Health Select Memphis Silver 11	66842TN0050010						0.915
Community Health Select Memphis Silver 12	66842TN0050015						0.895
Community Health Select Memphis Silver 13	66842TN0050020						0.913
Community Health Select Memphis Silver 14	66842TN0050025						0.980
Community Health Select Memphis Silver 15	66842TN0050030						0.780
Community Health Select Memphis Silver 16	66842TN0050035						0.888
Community Health Select Memphis Silver 17	66842TN0050040						0.829
Community Health Select Memphis Silver 19	66842TN0050080						0.930
Community Health Select Memphis Silver 30	66842TN0050121						0.790
Community Health Select Memphis Bronze 10	66842TN0050045						0.691
Community Health Select Memphis Bronze 11	66842TN0050050						0.697
Community Health Select Memphis Bronze 12	66842TN0050055						0.610
Community Health Select Memphis Bronze 13	66842TN0050060						0.754
Community Health Select Memphis Bronze 14	66842TN0050065						0.730
Community Health Select Memphis Bronze 15	66842TN0050085						0.668
Community Health Select Memphis Gold 10	66842TN0050070						1.187
Community Health Select Memphis Gold 12	66842TN0050075						1.091
Community Health Select Knoxville Silver 10	66842TN0050100						0.929
Community Health Select Knoxville Silver 11	66842TN0050101						0.945
Community Health Select Knoxville Silver 12	66842TN0050102						0.925
Community Health Select Knoxville Silver 13	66842TN0050103						0.944
Community Health Select Knoxville Silver 14	66842TN0050104						1.012
Community Health Select Knoxville Silver 15	66842TN0050105						0.806
Community Health Select Knoxville Silver 16	66842TN0050106						0.918
Community Health Select Knoxville Silver 17	66842TN0050107						0.857
Community Health Select Knoxville Silver 19	66842TN0050115						0.961
Community Health Select Knoxville Silver 30	66842TN0050122						0.817
Community Health Select Knoxville Bronze 10	66842TN0050108						0.724
Community Health Select Knoxville Bronze 11	66842TN0050109						0.730
Community Health Select Knoxville Bronze 12	66842TN0050110						0.639
Community Health Select Knoxville Bronze 13	66842TN0050111						0.790
Community Health Select Knoxville Bronze 14	66842TN0050112						0.764
Community Health Select Knoxville Bronze 15	66842TN0050116						0.699
Community Health Select Knoxville Gold 10	66842TN0050113						1.243
Community Health Select Knoxville Gold 12	66842TN0050114						1.142

¹Reflects actual AV pricing value. This may be slightly different than the product of the columns due to rounding used in the chart.

APPENDIX F

Actuarial Value Memorandum Community Health Alliance Mutual Insurance Company Tennessee 2016 Individual Filing

The purpose of this Actuarial Memorandum is to calculate the actuarial values for determining the level of coverage in the Federally Facilitated Exchange (and outside the Exchange) for Community Health Alliance Mutual Insurance Company's (CHA's) individual plans that could not be evaluated in the Health and Human Services (HHS) 2016 Actuarial Value Calculator. This memorandum addresses non-standard plans CHA intends to market inside and outside of the Exchange:

Table 1		
Gold	Silver*	Bronze
66842TN0050066	66842TN0050031	66842TN0050056
66842TN0050067	66842TN0050032	66842TN0050057
66842TN0050068	66842TN0050033	66842TN0050058
66842TN0050069	66842TN0050034	66842TN0050059
66842TN0050070	66842TN0050035	66842TN0050060
66842TN0050071	66842TN0050036	66842TN0050111
66842TN0050072	66842TN0050037	
66842TN0050073	66842TN0050038	
66842TN0050074	66842TN0050039	
66842TN0050075	66842TN0050040	
66842TN0050091	66842TN0050086	
66842TN0050092	66842TN0050087	
66842TN0050093	66842TN0050088	
66842TN0050113	66842TN0050106	
66842TN0050114	66842TN0050107	
	66842TN0050117	
	66842TN0050118	
	66842TN0050119	
	66842TN0050120	
	66842TN0050121	
	66842TN0050122	

*Includes CSR Variations

Due to the complexity of some of the cost sharing features, these plans could not be evaluated directly in the HHS Actuarial Value Calculator. Therefore, Milliman's *Health Cost Guidelines (HCGs)* were used to develop plan relativities, which are applied to the actuarial values calculated in the HHS Actuarial Value Calculator.

BACKGROUND

The Patient Protection and Affordable Care Act (ACA) requires issuers in the individual and small group markets, inside and outside of the Exchange, to offer minimum levels of coverage for Essential Health Benefits (EHB). These levels of coverage are measured in the form of actuarial values, as described in the following formula:

$$\text{Actuarial Value} = \frac{\text{Anticipated Plan Paid Allowed Charges for EHB Coverage for Standard Population}}{\text{Anticipated Total Allowed Charges for EHB Coverage for Standard Population}}$$

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The levels of coverage offered in the individual and small group markets must fall within certain actuarial value levels, as described in the following table:

Table 2	
Metallic Level	Actuarial Value Range
Bronze	58%-62%
Silver	68%-72%
Gold	78%-82%
Platinum	88%-92%

HHS developed an Actuarial Value Calculator for issuers to use to evaluate plan designs and to ensure offerings meet the above criteria. The underlying costs in the Actuarial Value Calculator cover all federally mandated EHB and reflect a standard individual and small group population.

For plans with cost sharing which cannot be accommodated in the Actuarial Value Calculator, an actuary must certify these plans fall within the above ranges for their metallic levels. In CHA's proposed plans, there was one plan design feature that could not be accommodated in the Actuarial Value Calculator. Therefore, adjustment factors were developed and applied to the actuarial value calculated by the Actuarial Value Calculator for each of these plans.

The plan design feature which could not be accommodated in the Actuarial Value Calculator is related to cost sharing for labs and x-rays. CCHP offers some plans that provide lab and x-ray at no cost sharing if they are performed in an office visit setting that is covered by an office visit copay. The Actuarial Value Calculator does not separately model Lab and X-ray within an office visit.

RESULTS

Exhibit 1a includes the results of our actuarial value analysis for CHA's standard plans that did not fit in the Actuarial Value Calculator. Exhibit 1b includes the results of our actuarial value analysis for CHA's Cost Share Reduction plans that did not fit in the Actuarial Value Calculator. Based on the final actuarial values listed in Exhibits 1a and 1b, all plans fall within the de minimus range for their metallic tiers.

METHODOLOGY AND ASSUMPTIONS

We calculated actuarial values for CHA's proposed plans using outputs from the final 2016 HHS Actuarial Value Calculator, in combination with models developed from Milliman's *HCGs*. The *HCGs* are a cooperative effort of all Milliman health actuaries and represent a combination of their experience, research and judgment. An extensive amount of data is used in developing the *HCGs* and that data is updated annually.

The *HCGs* provide a flexible but consistent basis for the determination of health claim costs and premium rates for a wide variety of health plans. The *HCGs* are developed as a result of Milliman's continuing research on health care costs. First developed in 1954, the *HCGs* have been updated and expanded annually since that time. The *HCGs* are continually monitored as they are used in measuring the experience or evaluating the rates of health plans, and as they are compared to other data sources.

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The *HCGs* consider utilization and average charge levels for roughly 60 benefit categories. These models make provision, by type of service category, for benefit characteristics such as copays, deductibles, coinsurance, and out-of-pocket maximums.

To calculate a final actuarial value for each of CHA's plans, the plans were input into the Actuarial Value Calculator in a manner that fits with the Calculator's methodology.

The same plan, as input into the HHS Actuarial Value Calculator, was modeled using the Milliman *HCGs*. Then the plan was modified to the actual plan design as CHA will administer the benefits using the Milliman *HCGs*. We developed a plan relativity factor (column 2 in both Exhibits) to apply to the result from the Actuarial Value Calculator:

$$\text{Relativity Factor} = \frac{\text{Actuarial Value From Pricing All Benefit Provisions using the } HCGs}{\text{Actuarial Value From Pricing Benefits as Interpreted By the Actuarial Value Calculator using the } HCGs}$$

DATA RELIANCE AND CAVEATS

The actuarial values provided in this letter were developed from assumptions established based on the available data and other information provided by CHA. If more relevant data becomes available, the assumptions should be revised. A revision in these assumptions might change the results and possibly, the related conclusions. Actual experience will vary from expected.

The actuarial values provided in this memorandum were developed using the final 2016 HHS Actuarial Value Calculator and Milliman's Commercial *HCGs*.

This memorandum is provided to insurance regulators in Tennessee for their internal use in accordance with established regulatory procedures. It may not be shown or distributed to any other party without the prior written consent of Milliman, Inc. Furthermore, any distribution of this memorandum must be in its entirety.

Actuarial methods, considerations and analyses used in forming my opinion conform to the appropriate Standards of Practice as promulgated from time to time by the Actuarial Standards Board, which standards form the basis of this memorandum. Any reader of this report must possess a substantial level of expertise in areas relevant to this analysis to appreciate the significance of the assumptions used in the analysis, and the impact of the assumptions on the illustrated results.

Qualifications

I, Kimberley K. Hiemenz, Consulting Actuary, am a Member of the American Academy of Actuaries, and meet its qualification standards to provide this certification. I am associated with the firm of Milliman, Inc. My firm has been retained and I reviewed the attached actuarial values for the following CHA individual medical plans effective January 1, 2016 for determining the level of coverage inside and outside the Exchange.

Certification

I used the 2016 Actuarial Value Calculator to determine the actuarial value for the plan provisions that fit within the calculator parameters and made appropriate adjustments to the actuarial values identified by the calculator, for plan design features that deviate substantially from the parameters of the Actuarial

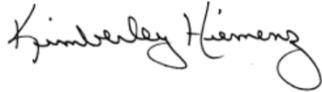
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Values Calculator. To the best of my knowledge, these actuarial values are calculated in compliance with the Department of Health and Human Services (HHS) and Tennessee Insurance Law.

I certify the adjustments made to the actuarial value as identified by Actuarial Value Calculator are appropriate and in accordance with generally accepted actuarial principles and methodologies.

Respectfully Submitted,



Kimberley K. Hiemenz, FSA, MAAA
Principal and Consulting Actuary, Milliman
October 9, 2015

Exhibit 1a
Community Health Alliance Mutual Insurance Company
Actuarial Value Calculations for Standard Plans that Required Adjustments
Outside of the Federal Actuarial Value Calculator

	(1)	(2)	(3) = (1)*(2)
Plan	Starting AV from the HHS AVC	Adjustment	Final AV
66842TN0050031			69.5%
66842TN0050032			69.5%
66842TN0050033			69.5%
66842TN0050034			69.5%
66842TN0050035			69.5%
66842TN0050036			71.3%
66842TN0050037			71.3%
66842TN0050038			71.3%
66842TN0050039			71.3%
66842TN0050040			71.3%
66842TN0050056			61.6%
66842TN0050057			61.6%
66842TN0050058			61.6%
66842TN0050059			61.6%
66842TN0050060			61.6%
66842TN0050066			81.1%
66842TN0050067			81.1%
66842TN0050068			81.1%
66842TN0050069			81.1%
66842TN0050070			81.1%
66842TN0050071			79.8%
66842TN0050072			79.8%
66842TN0050073			79.8%
66842TN0050074			79.8%
66842TN0050075			79.8%
66842TN0050086			71.1%
66842TN0050087			71.1%
66842TN0050088			71.1%
66842TN0050091			79.4%
66842TN0050092			79.4%
66842TN0050093			79.4%
66842TN0050106			69.5%
66842TN0050107			71.3%
66842TN0050111			61.6%
66842TN0050113			81.1%
66842TN0050114			79.8%
66842TN0050117			69.4%
66842TN0050118			69.4%
66842TN0050119			69.4%
66842TN0050120			69.4%
66842TN0050121			69.4%
66842TN0050122			69.4%

Exhibit 1b Community Health Alliance Mutual Insurance Company Actuarial Value Calculations for CSR Plans that Required Adjustments Outside of the Federal Actuarial Value Calculator			
	(1)	(2)	(3) = (1)*(2)
Plan	Starting AV from the HHS AVC	Adjustment	Final AV
66842TN0050031 - Silver 73% CSR			73.5%
66842TN0050031 - Silver 87% CSR			86.9%
66842TN0050031 - Silver 94% CSR			93.5%
66842TN0050032 - Silver 73% CSR			73.5%
66842TN0050032 - Silver 87% CSR			86.9%
66842TN0050032 - Silver 94% CSR			93.5%
66842TN0050033 - Silver 73% CSR			73.5%
66842TN0050033 - Silver 87% CSR			86.9%
66842TN0050033 - Silver 94% CSR			93.5%
66842TN0050034 - Silver 73% CSR			73.5%
66842TN0050034 - Silver 87% CSR			86.9%
66842TN0050034 - Silver 94% CSR			93.5%
66842TN0050035 - Silver 73% CSR			73.5%
66842TN0050035 - Silver 87% CSR			86.9%
66842TN0050035 - Silver 94% CSR			93.5%
66842TN0050036 - Silver 73% CSR			73.4%
66842TN0050036 - Silver 87% CSR			86.6%
66842TN0050036 - Silver 94% CSR			94.2%
66842TN0050037 - Silver 73% CSR			73.4%
66842TN0050037 - Silver 87% CSR			86.6%
66842TN0050037 - Silver 94% CSR			94.2%
66842TN0050038 - Silver 73% CSR			73.4%
66842TN0050038 - Silver 87% CSR			86.6%
66842TN0050038 - Silver 94% CSR			94.2%
66842TN0050039 - Silver 73% CSR			73.4%
66842TN0050039 - Silver 87% CSR			86.6%
66842TN0050039 - Silver 94% CSR			94.2%
66842TN0050040 - Silver 73% CSR			73.4%
66842TN0050040 - Silver 87% CSR			86.6%
66842TN0050040 - Silver 94% CSR			94.2%
66842TN0050086 - Silver 73% CSR			73.6%
66842TN0050086 - Silver 87% CSR			86.7%
66842TN0050086 - Silver 94% CSR			93.0%
66842TN0050087 - Silver 73% CSR			73.6%
66842TN0050087 - Silver 87% CSR			86.7%
66842TN0050087 - Silver 94% CSR			93.0%
66842TN0050088 - Silver 73% CSR			73.6%
66842TN0050088 - Silver 87% CSR			86.7%
66842TN0050088 - Silver 94% CSR			93.0%
66842TN0050106 - Silver 73% CSR			73.5%
66842TN0050106 - Silver 87% CSR			86.9%
66842TN0050106 - Silver 94% CSR			93.5%
66842TN0050107 - Silver 73% CSR			73.4%
66842TN0050107 - Silver 87% CSR			86.6%
66842TN0050107 - Silver 94% CSR			94.2%
66842TN0050117 - Silver 73% CSR			73.2%
66842TN0050117 - Silver 87% CSR			86.4%
66842TN0050117 - Silver 94% CSR			93.9%
66842TN0050118 - Silver 73% CSR			73.2%
66842TN0050118 - Silver 87% CSR			86.4%
66842TN0050118 - Silver 94% CSR			93.9%
66842TN0050119 - Silver 73% CSR			73.2%
66842TN0050119 - Silver 87% CSR			86.4%
66842TN0050119 - Silver 94% CSR			93.9%
66842TN0050120 - Silver 73% CSR			73.2%
66842TN0050120 - Silver 87% CSR			86.4%
66842TN0050120 - Silver 94% CSR			93.9%
66842TN0050121 - Silver 73% CSR			73.2%
66842TN0050121 - Silver 87% CSR			86.4%
66842TN0050121 - Silver 94% CSR			93.9%
66842TN0050122 - Silver 73% CSR			73.2%
66842TN0050122 - Silver 87% CSR			86.4%
66842TN0050122 - Silver 94% CSR			93.9%