



## **Plan Management Advisory Workgroup Meeting**

May 12, 2022

# AGENDA

Time	Topic	Presenter
10:00 – 10:05	Welcome and Agenda Review	Rob Spector
10:05 – 10:50	Affordability Contingency Planning	Katie Ravel
10:50 – 11:00	Open Forum	All

# 2023 AFFORDABILITY CONTINGENCY PLANNING

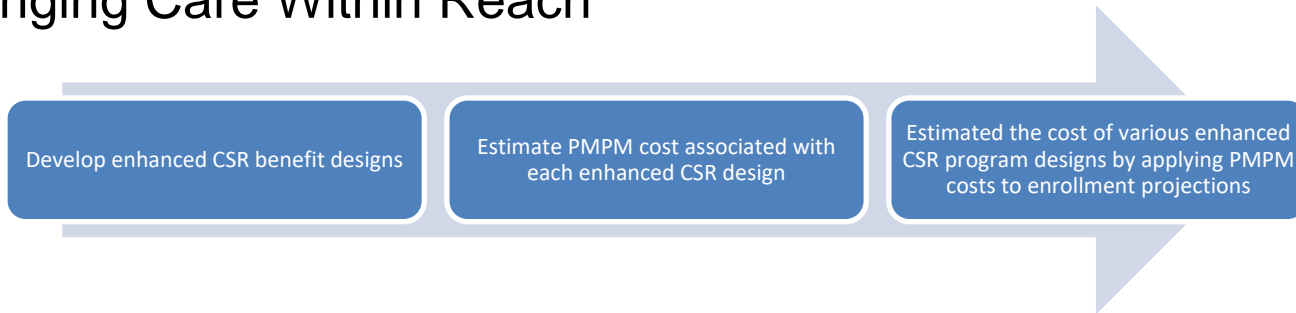
Katie Ravel, Director  
Policy, Eligibility & Research Policy

# 2023 AFFORDABILITY CONTINGENCY PLANNING

- Covered California has consolidated our contingency planning scenarios:
  1. American Rescue Plan premium (ARP) subsidies expire
  2. American Rescue Plan (ARP) premium subsidies are extended with federal or state support for enhanced cost-sharing
  
- Today's presentation will focus on contingency plan for enhanced cost-sharing support

# ENHANCED COST-SHARING REDUCTION (CSR) MODELING UPDATED

- To inform ongoing discussions about enhanced CSR support for the 2023 plan year, Covered California updated key tables included in Bringing Care Within Reach (AB 133 report) including:
  - Enhanced CSR Benefit Designs
  - Marginal per member per month (PMPM) payment rates
  - Annual costs for seven enhanced CSR program designs included in Bringing Care Within Reach



# SUMMARY OF KEY COMPONENTS OF 2023 STANDARD BENEFIT DESIGNS AND ILLUSTRATIVE ENHANCED CSR BENEFIT DESIGNS

Plan Description	Existing or Illustrative	DEDUCTIBLE			COPAYS				Actuarial Value
		Inpatient*	Outpatient	Drug	MOOP	PCP	X-Ray	Drugs <sup>§</sup>	
<b>Individual Silver 70</b>	Existing	\$4,750	\$0	\$85	\$8,750	\$45	\$95	\$16/60/90/20%	71.57%
<b>73 Silver</b>	Existing	\$4,750	\$0	\$30	\$7,250	\$45	\$90	\$16/55/85/20%	73.86%
<b>73 Silver without deductible</b>	Illustrative <sup>†</sup>	\$0	\$0	\$0	\$7,250	\$45	\$90	\$16/55/85/20%	75.75%
<b>80 Silver</b>	Illustrative	\$0	\$0	\$0	\$4,900	\$30	\$80	\$10/40/70/20%	80.98%
<b>85 Silver</b>	Illustrative	\$0	\$0	\$0	\$4,900	\$15	\$40	\$5/25/45/15%	85.97%
<b>87 Silver</b>	Existing	\$800	\$0	\$25	\$3,000	\$15	\$40	\$5/25/45/15%	87.86%
<b>87 Silver without deductible</b>	Illustrative <sup>†</sup>	\$0	\$0	\$0	\$3,000	\$15	\$40	\$5/25/45/15%	88.62%
<b>90 Silver</b>	Illustrative	\$0	\$0	\$0	\$2,100	\$5	\$40	\$4/20/40/15%	90.96%
<b>94 Silver</b>	Existing	\$75	\$0	\$0	\$900	\$5	\$8	\$3/10/15/10%	94.88%
<b>94 Silver without deductible</b>	Illustrative <sup>†</sup>	\$0	\$0	\$0	\$900	\$5	\$8	\$3/10/15/10%	95.14%
<b>95 Silver</b>	Illustrative	\$0	\$0	\$0	\$700	\$3	\$5	\$3/10/15/10%	95.97%

Source: Updated from Table 5 in Bringing Care Within Reach. Illustrative enhanced designs are based on 2023 Standard Benefit Designs and 2023 AV calculator.

<sup>†</sup> Illustrative enhanced designs titled “with deductibles removed” are modified versions of existing plans (i.e., the inpatient and drug deductibles are removed from the 2023 Silver and CSR plans). For simplicity, we use the parallel naming convention for these illustrative plans, however the AVs are different due to the changes made. For example, 73 Silver with deductibles removed (Illustrative) has an AV that is higher than 73 percent.

\* The inpatient deductible applies to both inpatient facility and skilled nursing facilities.

<sup>§</sup> Cost sharing for drugs is shown as Tier 1/Tier 2/Tier 3/Tier 4. Tier 1 is most generic drugs and low-cost preferred brands. Tier 2 is non-preferred generics and preferred brand drugs. Tier 3 is non-preferred brand drugs. Tier 4 is specialty drugs and biologics.

# ESTIMATED 2023 STATEWIDE MARGINAL PMPM PAYMENT RATES BY INCOME BAND FOR ENHANCED CSR BENEFIT DESIGNS

Plan Design	Per Member Per Month (PMPM) Cost Differential with Baseline Plan			
	Incomes up to 150% FPL	Incomes up to 150%-200% FPL	Incomes up to 200%-250% FPL	Incomes up to 250%-600% FPL
Individual Silver				Baseline Plan
Silver 73			Baseline Plan	\$11.55
Silver 73 without Deductible			\$4.65	\$16.20
Silver 80			\$29.25	\$40.80
Silver 85			\$63.80	\$75.35
Silver 87		Baseline Plan	\$70.75	\$82.30
Silver 87 without Deductible		\$4.30	\$75.05	\$86.60
Silver 90		\$28.10	\$98.85	\$110.40
Silver 94	Baseline Plan	\$53.00	\$123.75	\$135.30
Silver 94 without Deductible	\$0.25	\$53.25	\$124.00	\$135.55
Silver 95	\$6.60	\$59.55	\$130.35	\$141.90

Notes: Marginal PMPM costs are broken out by income band. Each income band currently has access to a different Silver CSR variant as its baseline plan. For each column, the baseline plan is shown in the row that corresponds to the 'Baseline Plan' label. For example, in the 'Up to 150% FPL' column, the baseline plan is 94 Silver. PMPMs presented in this chart are at the statewide level. Regional PMPMs are under development.

# UPDATED 2023 COSTS FOR ENHANCED CSR PROGRAM DESIGNS

✓ = benefit or eligibility enhancement

■ = richer CSR support

Option	Summary	Description	Up to 150% FPL		150-200% FPL		200-250% FPL		250-300% FPL		300-400% FPL		400-600% FPL		Estimated 2023 Cost
			CSR Upgrade	No Deductible	CSR Upgrade	No Deductible	CSR Upgrade	No Deductible	New CSR Eligibility	No Deductible	New CSR Eligibility	No Deductible	New CSR Eligibility	No Deductible	
	Current CSR Eligibility		CSR Eligible						CSR Ineligible						
	AV of ACA Silver Products		94		87		73		70		70		70		
Options for Federally-funded Program	1	AV 95/90/85/80 with no deductibles	95		95	✓	90	✓	90	✓	85	✓	80	✓	\$748 million
				✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
				✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
Options for Federally-funded Program	2	AV 95/90/85 with no deductibles	95		95	✓	90	✓	90	✓	85	✓	70		\$721 million
				✓	✓	✓	✓	✓	✓	✓	✓	✓			
				✓	✓	✓	✓	✓	✓	✓	✓	✓			
Options for Federally-funded Program	3	ACA CSR plan upgrade with no deductibles and Gold AV for 300-400% FPL	94		94	✓	87	✓	87	✓	80	✓	70		\$552 million
				✓	✓	✓	✓	✓	✓	✓	✓	✓			
				✓	✓	✓	✓	✓	✓	✓	✓	✓			
Options for State-funded Program	4	ACA CSR plan upgrade with no deductibles and Gold AV for 250-400% FPL	94		94	✓	87	✓	80	✓	80	✓	70		\$490 million
				✓	✓	✓	✓	✓	✓	✓	✓	✓			
	5	ACA CSR plan upgrade for 150-250% FPL	94		94	✓	87	✓	70		70		70		\$372 million
					✓	✓									
Options for State-funded Program	6	ACA CSR plans with no Deductibles and Gold AV for 200-400% FPL	94		87	✓	80	✓	80	✓	80	✓	70		\$183 million
				✓	✓	✓	✓	✓	✓	✓	✓	✓			
				✓	✓	✓	✓	✓	✓	✓	✓	✓			
Options for State-funded Program	7	ACA CSR plans with no Deductibles	94		87	✓	73	✓	73	✓	73	✓	70		\$72 million
				✓	✓	✓	✓	✓	✓	✓	✓	✓			

Source: Updated from Table 6 in Bringing Care Within Reach.

Notes: ACA = Affordable Care Act, AV = actuarial value, CSR = cost-sharing reduction, FPL = federal poverty level. Green shading indicates richer CSR plan provided in the option compared to the Affordable Care Act. For simplicity, ACA CSR plans with deductibles removed are displayed with their original actuarial values (i.e., 94, 87 and 73), even though their computed actuarial value would be higher due to the removal of the deductible. Estimated 2023 costs are based on initial projections of 2023 Silver tier enrollment if American Rescue Plan premium subsidies are extended beyond 2022.





# OPERATIONAL MILESTONES FOR 2023 PLAN YEAR

Milestone	Estimated Timeframe
May Board Meeting	May 19, 2022
June Board Meeting	June 16, 2022
Qualified Health Plan Negotiations	June 2022
Public Posting of Proposed Rates	July 2022
Enhanced CSR Program Design Loaded in CalHEERS	Mid-July 2022
Carrier Integration Testing for the 2023 Plan Year	July – August 2022
CalHEERS Release for the 2023 Plan Year	September 2022
Public Posting of Final Rates	September – October 2022

# POTENTIAL 2023 ENHANCED BENEFIT DESIGNS SIDE-BY-SIDE VIEW

	Enhanced Silver 95		Enhanced Silver 94 No Deductible		Enhanced Silver 90		Enhanced Silver 87 No Deductible		Enhanced Silver 85		Enhanced Silver 80		Enhanced Silver 73 No Deductible	
Enhanced Benefit Design	ACA Silver 94		ACA Silver 94		ACA Silver 87		ACA Silver 87		ACA Silver 87		ACA Silver 73		ACA Silver 73	
	Ded	Amount	Ded	Amount	Ded	Amount	Ded	Amount	Ded	Amount	Ded	Amount	Ded	Amount
Deductible														
Medical Deductible		\$0		\$0		\$0		\$0		\$0		\$0		\$0
Drug Deductible		\$0		\$0		\$0		\$0		\$0		\$0		\$0
COinsurance (Member)		10%		10%		15%		15%		15%		20%		20%
MOOP		\$700		\$900		\$2,100		\$3,000		\$4,900		\$4,900		\$7,250
ED Facility Fee		\$50		\$50		\$150		\$150		\$150		\$400		\$400
Inpatient Facility Fee		10%		10%		15%		25%		25%		30%		30%
Inpatient Physician Fee		10%		10%		15%		25%		25%		30%		30%
Primary Care Visit		\$3		\$5		\$5		\$15		\$15		\$30		\$45
Specialist Visit		\$5		\$8		\$15		\$25		\$25		\$70		\$85
MH/SU Outpatient Services		\$3		\$5		\$5		\$15		\$15		\$30		\$45
Imaging (CT/PET Scans, MRIs)		\$50		\$50		\$100		\$100		\$100		\$325		\$325
Speech Therapy		\$3		\$5		\$5		\$15		\$15		\$30		\$45
Occupational and Physical Therapy		\$3		\$5		\$5		\$15		\$15		\$30		\$45
Laboratory Services		\$5		\$8		\$20		\$20		\$20		\$40		\$50
X-rays and Diagnostic Imaging		\$5		\$8		\$40		\$40		\$40		\$80		\$90
Skilled Nursing Facility		10%		10%		15%		25%		25%		30%		30%
Outpatient Facility Fee		10%		10%		15%		15%		15%		20%		20%
Outpatient Physician Fee		10%		10%		15%		15%		15%		20%		20%
Tier 1 (Generics)		\$3		\$3		\$4		\$5		\$5		\$10		\$16
Tier 2 (Preferred Brand)		\$10		\$10		\$20		\$25		\$25		\$40		\$55
Tier 3 (Nonpreferred Brand)		\$15		\$15		\$40		\$45		\$45		\$70		\$85
Tier 4 (Specialty)		10%		10%		15%		15%		15%		20%		20%
Tier 4 Maximum Coinsurance		\$150		\$150		\$150		\$150		\$150		\$250		\$250
Maximum Days for charging IP copay														
Begin PCP deductible after # of copays														
<b>Actuarial Value</b>														
2023 AV (Draft 2023 AVC)		95.97		95.14		90.96		88.62		85.97		80.98		75.75
2023 Proposed SBD AV (Draft2023 AVC)		94.88		94.88		87.86†		87.86†		87.86†		73.86†		73.86†

# APPENDIX I: 2023 BENEFIT DESIGN DETAILS

# 2023 ACA PLAN DESIGNS SIDE-BY-SIDE VIEW INDIVIDUAL & FAMILY PLAN

Benefit	Individual-only Platinum Coinsurance		Individual-only Platinum Copay		Individual-only Gold Coinsurance		Individual-only Gold Copay		Individual-only Silver		Silver 73		Silver 87		Silver 94		Bronze		Bronze HDHP		
	Ded	Amount	Ded	Amount	Ded	Amount	Ded	Amount	Ded	Amount	Ded	Amount	Ded	Amount	Ded	Amount	Ded	Amount	Ded	Amount	
Deductible																					
Medical Deductible									\$4,750		\$4,750		\$800		\$75		\$6,300			\$7,000	
Drug Deductible									\$85		\$30		\$25		\$0		\$500				
Coinsurance (Member)									20%		20%		15%		10%		40%			0%	
MOOP		\$4,500		\$4,500		\$8,550		\$8,550		\$8,750		\$7,250		\$3,000		\$900		\$8,200		\$7,000	
ED Facility Fee		\$150		\$150		\$350		\$350		\$400		\$400		\$150		\$50	X	40%	X	0%	
Inpatient Facility Fee		10%		\$250		30%		\$350	X	30%	X	30%	X	25%	X	10%	X	40%	X	0%	
Inpatient Physician Fee		10%		---		30%		---		30%		30%		25%		10%	X	40%	X	0%	
Primary Care Visit		\$15		\$35		\$35		\$35		\$45		\$45		\$15		\$5	X	\$65	X	0%	
Specialist Visit		\$30		\$65		\$65		\$65		\$85		\$85		\$25		\$8	X	\$95	X	0%	
MH/SU Outpatient Services		\$15		\$35		\$35		\$35		\$45		\$45		\$15		\$5	X	\$65	X	0%	
Imaging (CT/PET Scans, MRIs)		10%		\$75		25%		\$75		\$325		\$325		\$100		\$50	X	40%	X	0%	
Speech Therapy		\$15		\$15		\$35		\$35		\$45		\$45		\$15		\$5		\$65	X	0%	
Occupational and Physical Therapy		\$15		\$15		\$35		\$35		\$45		\$45		\$15		\$5		\$65	X	0%	
Laboratory Services		\$15		\$15		\$40		\$40		\$50		\$50		\$20		\$8		\$40	X	0%	
X-rays and Diagnostic Imaging		\$30		\$30		\$75		\$75		\$95		\$90		\$40		\$8	X	40%	X	0%	
Skilled Nursing Facility		10%		\$150		30%		\$150	X	30%	X	30%	X	25%	X	10%	X	40%	X	0%	
Outpatient Facility Fee		10%		\$100		20%		\$150		20%		20%		15%		10%	X	40%	X	0%	
Outpatient Physician Fee		10%		\$25		20%		\$40		20%		20%		15%		10%	X	40%	X	0%	
Tier 1 (Generics)		\$5		\$5		\$15		\$15	X	\$16	X	\$16	X	\$5		\$3	X	\$18	X	0%	
Tier 2 (Preferred Brand)		\$15		\$60		\$60		\$60	X	\$60	X	\$60	X	\$25		\$10	X	40%	X	0%	
Tier 3 (Nonpreferred Brand)		\$25		\$85		\$85		\$85	X	\$90	X	\$85	X	\$45		\$15	X	40%	X	0%	
Tier 4 (Specialty)		10%		10%		20%		20%	X	20%	X	20%	X	15%		10%	X	40%	X	0%	
Tier 4 Maximum Coinsurance		\$250		\$250		\$250		\$250		\$250		\$250		\$150		\$150		\$500*			
Maximum Days for charging IP copay				5				5													
Begin PCP deductible after # of copays																				3 visits	
Actuarial Value																					
2023 AV (Draft 2023 AVC)		91.76		89.75		81.92		80.11		71.57†		73.86†		87.86†		94.88		64.54†		64.17	
2022 AV (Final 2022 AVC)		91.59		89.25		81.90		78.01		71.07†		73.42†		87.75†		94.66		64.78†		64.60	
Enrollment as of June 2021				61,090				151,430		227,540		124,900		328,850		205,510		352,860		108,220	
Percent of Total enrollment				4%				10%		15%		8%		21%		13%		23%		7%	
Enrollment as of June 2021				17,373		43,717		84,815		66,615											
Percent of Total enrollment				28%		72%		56%		44%											

KEY:		
	X	Subject to deductible
	*	Drug cap applies to all drug tiers
	†	Additive adjustment (Included in AV)
		Increased member cost from 2022
		Decreased member cost from 2022
		Covered cost meet AV
		Within 3 of upper de minimis
		Securely within AV



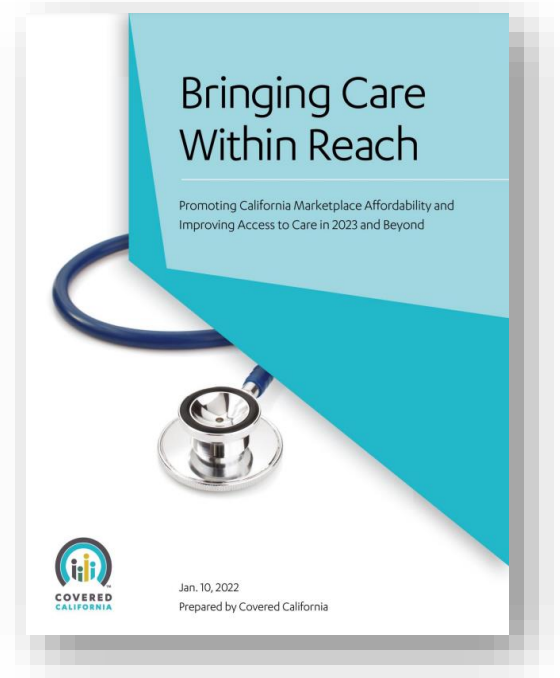
# APPENDIX II: SUMMARY INFORMATION AND ORIGINAL TABLES FROM BRINGING CARE WITHIN REACH

# HEALTH CARE AFFORDABILITY RESERVE FUND REPORT

- The 2021-2022 State Budget (AB 128) and Health Omnibus trailer bill (AB 133):
  - Redirected \$333.4 million from the General Fund to the Health Care Affordability Reserve Fund to be used for affordability programs operated by Covered California starting in plan year 2023; and
  - Directed Covered California to produce a report developing options for providing cost sharing reduction subsidies.

# BRINING CARE WITHIN REACH

- Covered California released “[Bringing Care within Reach: Promoting California Marketplace Affordability and Improving Access to Care in 2023 and Beyond.](#)”
- This report provides specific options for how California – or other states – could use state funds or federal funds that are anticipated in concept in the proposed Build Back Better Act to expand cost-sharing support.
- Accompanying the report is an [Issue Brief](#) and a companion detailed analysis produced by our actuaries at [Milliman](#).
- Options were developed with input and engagement from our stakeholder working group.
- Report was developed in compliance with the 2021-2022 State Budget (AB 128) and Health Omnibus trailer bill (AB 133).



**Table 5:** Summary of Key Components of Existing 2022 Covered California Plan Designs and Illustrative Plan Designs Used for Modeling Program Costs

Plan Description	Existing or Illustrative	DEDUCTIBLE				COPAYS				Federal Actuarial Value
		Inpatient*	Outpatient	Drug	MOOP	PCP	X-Ray	Drugs <sup>5</sup>		
Individual Silver 70	Existing	\$3,700	\$0	\$10	\$8,200	\$35	\$85	\$15/55/85/20%	71.5%	
Individual Silver 70 with deductibles removed	Illustrative <sup>†</sup>	\$0	\$0	\$0	\$8,200	\$35	\$85	\$15/55/85/20%	74.3%	
73 Silver	Existing	\$3,700	\$0	\$10	\$6,300	\$35	\$85	\$15/55/85/20%	73.9%	
73 Silver with deductibles removed	Illustrative <sup>†</sup>	\$0	\$0	\$0	\$6,300	\$35	\$85	\$15/55/85/20%	76.3%	
80 Silver	Illustrative	\$0	\$0	\$0	\$8,200	\$35	\$75	\$15/55/85/20%	79.8%	
85 Silver	Illustrative	\$0	\$0	\$0	\$5,200	\$15	\$40	\$5/25/45/15%	85.0%	
87 Silver	Existing	\$800	\$0	\$0	\$2,850	\$15	\$40	\$5/25/45/15%	87.9%	
87 Silver with deductibles removed	Illustrative <sup>†</sup>	\$0	\$0	\$0	\$2,850	\$15	\$40	\$5/25/45/15%	88.3%	
90 Silver	Illustrative	\$0	\$0	\$0	\$4,500	\$15	\$30	\$5/15/25/10%	89.3%	
94 Silver	Existing	\$75	\$0	\$0	\$800	\$5	\$8	\$3/10/15/10%	94.7%	
94 Silver with deductibles removed <sup>‡</sup>	Illustrative <sup>†</sup>	\$0	\$0	\$0	\$800	\$5	\$8	\$3/10/15/10%	94.9%	
99 Silver	Illustrative	\$0	\$0	\$0	\$250	\$0	\$0	\$0/10/10/10	99.7%	

Source: This table was reproduced from Table 1 in the companion Milliman report.

<sup>†</sup> Illustrative plans titled “with deductibles removed” are modified versions of existing plans (i.e., the inpatient and drug deductibles are removed from existing 2022 Silver and CSR plans). For simplicity, we used the parallel naming convention for these illustrative plans, however the AVs are different due to the changes made. For example, 73 Silver with deductibles removed (Illustrative) has an AV that is higher than 73 percent. Note that these plans are provided for illustrative purposes only. Actual 2023 plan designs will likely differ.

\* The inpatient deductible applies to both inpatient facility and skilled nursing facilities.

<sup>‡</sup> The plan 94 Silver with deductibles removed is also referred to as 95 Silver in this report.

<sup>5</sup> Cost sharing for drugs is shown as Tier 1/Tier 2/Tier 3/Tier 4. Tier 1 is most generic drugs and low-cost preferred brands. Tier 2 is non-preferred generics and preferred brand drugs. Tier 3 is non-preferred brand drugs. Tier 4 is specialty drugs and biologics.



**Table 2: Estimated 2023 Marginal PMPM Cost for Enhanced Benefits by Income Band, All California**

Plan Design	Per Member Per Month (PMPM) Cost Differential with Baseline Plan				
	Incomes up to 150% FPL	150%-200% FPL	200%-250% FPL	250%-300% FPL	300%-400% FPL
Individual Silver				Baseline Plan	Baseline Plan
Individual Silver without Deductible				\$7.30	\$7.30
73 Silver			Baseline Plan	\$10.70	\$10.70
73 Silver without Deductible			\$3.10	\$13.90	\$13.90
80 Silver			\$28.60	\$39.60	\$39.60
85 Silver			\$54.00	\$64.90	\$64.90
87 Silver		Baseline Plan	\$62.50	\$73.50	\$73.50
87 Silver without Deductible		\$1.00	\$63.60	\$74.60	\$74.60
90 Silver		\$20.40	\$83.30	\$94.40	\$94.40
94 Silver	Baseline Plan	\$47.50	\$110.60	\$121.80	\$121.80
94 Silver without Deductible (aka 95)	\$0.20	\$47.70	\$110.80	\$122.00	\$122.00
99 Silver	\$47.60	\$96.20	\$159.80	\$171.20	\$171.20

Note that the marginal PMPM costs are broken out by income band. Each income band currently has access to a different Silver CSR variant as its baseline plan. For each column, the baseline plan is shown in the row that corresponds to the 'Baseline Plan' label. For example, in the 'Up to 150% FPL' column, the baseline plan is 94 Silver.

**Table 6. Summary of Key Elements of Selected Cost-Sharing Reduction Options Modeled**

✓ = benefit or eligibility enhancement  
 ■ = richer CSR support

Option	Summary	Description	Up to 150% FPL		150-200% FPL		200-250% FPL		250-300% FPL		300-400% FPL		Annual Cost by Tier Switching Scenarios 1, 2, and 3 (millions)				
			CSR Upgrade	No Deductible	CSR Upgrade	No Deductible	New CSR Eligibility	CSR Upgrade	New CSR Eligibility	No Deductible	New CSR Eligibility	No Deductible	New CSR Eligibility	No Deductible	Current	Some Tier Switching	More Tier Switching
Current CSR Eligibility			CSR Eligible						CSR Ineligible								
AV of ACA Silver Products			94		87		73		70		70		70				
Options for Federally-funded Program	1	AV 95/90/85/80 with no deductibles	New eligibility for CSR up to 600% FPL. New products (min AV 80) under 600% FPL. No deductibles at any income below 600% FPL.	95		95		90		90		85		80	\$475	\$542	\$626
				✓		✓	✓	✓	✓	✓	✓	✓	✓	✓			
				95		95		90		90		85		70	\$463	\$526	\$604
			✓		✓	✓	✓	✓	✓	✓	✓	✓					
Options for State-funded Program	3	ACA CSR plan upgrade with no deductibles and Gold AV for 300-400% FPL	New eligibility for CSR up to 400% FPL. New CSR products (min AV 80) up to 400% FPL.	94		94		87		87		80		70	\$386	\$433	\$489
				✓		✓	✓	✓	✓	✓	✓	✓	✓				
				94		94		87		80		80		70	\$362	\$403	\$452
			✓		✓	✓	✓	✓	✓	✓	✓	✓					
Options for State-funded Program	4	ACA CSR plan upgrade with no deductibles and Gold AV for 250-400% FPL	New eligibility for CSR up to 400% FPL. New CSR products (min AV 80) up to 400% FPL.	94		94		87		80		80		70	\$278	\$299	\$322
				94		94		87		70		70		70	\$128	\$154	\$189
				94		87		80		80		80		70	\$37	\$45	\$55
				✓		✓		✓	✓	✓	✓	✓	✓				
Options for State-funded Program	5	ACA CSR plan upgrade for 150-250% FPL	Richer CSR below 250% FPL, moving Silver 87 to Silver 94 and Silver 73 to Silver 87.	94		94		87		70		70		70	\$37	\$45	\$55
				94		87		80		80		80		70	\$37	\$45	\$55
				94		87		73		73		73		70	\$37	\$45	\$55
				✓		✓		✓		✓		✓		✓			
Options for State-funded Program	6	ACA CSR plans with no Deductibles and Gold AV for 200-400% FPL	New CSR product (AV 80) for 200% FPL. No deductibles at any income below 400% FPL.	94		87		80		80		80		70	\$37	\$45	\$55
				94		87		80		80		80		70	\$37	\$45	\$55
				94		87		73		73		73		70	\$37	\$45	\$55
				✓		✓		✓		✓		✓		✓			
Options for State-funded Program	7	ACA CSR plans with no Deductibles	Existing CSR products across the income spectrum. No deductibles at any income below 400% FPL.	94		87		73		73		73		70	\$37	\$45	\$55
				94		87		73		73		73		70	\$37	\$45	\$55
				94		87		73		73		73		70	\$37	\$45	\$55
				✓		✓		✓		✓		✓		✓			

Source: Adapted from Table 5 in the companion Milliman report. Table 5 in the Milliman report also includes modeling of cost-sharing reduction programs in Colorado, Massachusetts and Vermont (Options 8-11).

Notes: ACA = Affordable Care Act, AV = actuarial value, CSR = cost-sharing reduction, FPL = federal poverty level. Green shading indicates richer CSR plan provided in the option compared to the Affordable Care Act. For simplicity, ACA CSR plans with deductibles removed are displayed with their original actuarial values (i.e., 94, 87 and 73), even though their computed actuarial value would be higher due to the removal of the deductible as shown in Table 5.

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