

DISCLOSURES AND LIMITATIONS

Responsible Actuary. I, Ksenia Whittal, am the actuary responsible for this communication. I am a Member of the American Academy of Actuaries and a Fellow of the Society of Actuaries. I meet the Qualification Standards of the American Academy of Actuaries to issue this analysis.

Purpose. The purpose of this analysis is to provide updated estimates of the state premium subsidy amounts (flat per member per month) provided under a state-based premium subsidy program starting in 2023, given the preliminary 2023 filed premium increases by the participating issuers and several scenarios (low, best and high enrollment, assuming expiration and continuation of the American Rescue Plan Act (ARP)). The goal for this analysis is to facilitate discussions with stakeholders on potential program structures and review the changes in the subsidy amounts from the prior estimates. The goal of this review is to ensure that the information included in the model provides enough details and the type of information necessary to evaluate the program structures in order make a recommendation as well as ensure that the directionality and magnitude of changes in assumptions or the program structure are in line with expectations.

Intended Users. This information has been prepared for the sole use of the Washington Health Benefits Exchange (WAHBE). It is our understanding that this model will be provided to members of the stakeholder group, including carrier participants, for review. This model cannot be distributed to or relied upon by any other third party without the prior written permission of Wakely. This information is confidential and proprietary.

Risks and Uncertainties. The assumptions and resulting estimates included in this analysis are inherently uncertain, and numerous projection assumptions may be refined before the final report. Users of the results should be qualified to use it and understand the results and the inherent uncertainty. Actual results may vary, potentially materially, from our estimates. Note that since the 2023 premium increases are the initial filing requests, it is likely that the final approved rates could potentially be different from the increases used in this analysis and consequently affecting the results. Wakely does not warrant or guarantee the projected values included in the analysis. It is the responsibility of the organization receiving this output to review the assumptions carefully and notify Wakely of any potential concerns.

This is a market level analysis. Actual experience for any issuer could be notably different than the market average.

Conflict of Interest. The responsible actuaries are financially independent and free from conflict concerning all matters related to performing the actuarial services underlying this analysis. In addition, Wakely is organizationally and financially independent to WAHBE.

Data and Reliance. We have relied on others for data and assumptions used in the assignment. We have reviewed the data for reasonableness, but have not performed any independent audit or otherwise verified the accuracy of the data/information. If the underlying information is incomplete or inaccurate, our estimates may be impacted, potentially significantly. For some estimates, there are multiple sources of information, including public sources. In some cases, the different sources produce meaningfully different data/information. For example, the distribution of uninsured by income level as reported by the 2018 ACS data and summary provided by OFM contain different distributions by income level, though the total number of uninsured are similar. In this version of the model, we have reviewed the data for reasonableness, however, we continue to review the various sources of information and subsequent versions may incorporate adjustments to better reflect the market in Washington.

Subsequent Events. There are no known relevant events subsequent to the date of information received that would impact the results of this report.

Contents of Actuarial Report. This document and the supporting exhibits/files constitute the entirety of actuarial report and supersede any previous communications on the project.

Deviations from ASOPS. Wakely completed the analysis using sound actuarial practice. To the best of my knowledge, the report and methods used in the analysis are in compliance with the appropriate Actuarial Standards of Practice (ASOP) with no known deviations.

RELIANCES

Wakely has utilized data provided by WAHBE as well as public data in the analyses described in this report.

• 2023 premium changes from initial rate filings as well as the change in the second-lowest cost silver (SLCS) plan by county, as provided by the state.

• 2022 enrollment data through January 2022, including county, plan, metal level, premiums (before and after APTC), APTC, household, income, age, race, ethnicity, effectuation status

• 2022 enrollment data through April 2022 including subsidy and effectuation status

• 2021 and 2022 Final Rate data for all carriers by plan, age, and county

• OFM FPL and Immigration Status of the Uninsured: 2018 and 2019

• Information on implementation considerations and requirements for WAHBE to administer the programs discussed in this report

• Emerging open enrollment results for the 2022 benefit year, as of December 3, 2021

In addition to the data described above, Wakely relied on the following public data sources to inform the assumptions used in the analyses:

• Small Area Health Insurance Estimates: 2019

• Medical Loss Ratio Data: Public Use File for 2019

• Summary Report on Permanent Risk Adjustment Transfers for the 2020 Benefit Year

• Congressional Budget Office (CBO) Background Paper "The Price Sensitivity of Demand for Nongroup Health Insurance"

• CBO "How CBO and JCT Analyzed Coverage Effects of New Rules for Association Health Plans and Short-Term Plans"

• Kaiser Family Foundation Distribution of Nonelderly Uninsured Individuals who are Ineligible for Financial Assistance

CAVEATS

The following are additional caveats that could have an impact on results:

Data Limitations. No updates to the actual member-level enrollment since January 2022 has been made. The overall number of subsidized and unsubsidized members in 2022 data was adjusted to match April 2022 effectuated enrollment, more closely resembling recent member attrition and effectuation rates. Still, there is uncertainty on attrition patterns or other changes through the remainder of 2022 by other member characteristics such as income, plan metal tier, age and county. Changes to base estimates could influence estimates. Secondly, income data was not available for a large portion of the on-Exchange enrollment and for the off-Exchange customers. It is assumed that these customers would not be eligible for state subsidies due to higher incomes. To the extent these customers would be eligible for state subsidies, the cost estimates could be understated. Data on individual market income levels includes a certain level of error and uncertainty. The extent to which incomes of either the currently insured or uninsured differ from the estimates may result in material changes in the estimates.

Political Uncertainty. There is significant policy uncertainty. Future federal actions such as additional unemployment insurance payments or other Federal actions could change the estimates enclosed in this report. Additionally, the timing of the end of the Federal emergency declaration over COVID-19 could affect enrollment. Changes to Federal laws and regulations may also impact the estimates. Finally, policy changes at the state level, such as regulations around standard plan designs or public option.

Enrollment Uncertainty. Additionally, there is enrollment uncertainty. Beyond changes to potential rates and policy, individual member or firm responses to these changes also has uncertainty. There is significant uncertainty of take-up levels among the undocumented individuals as these members have not previously been eligible for enrollment in QHPs.

Premium Uncertainty. Given the potential change in enrollment, metal level enrollment decisions, or other enrollment decisions could influence the average premium in the market.

Economic Uncertainty. There remains considerable uncertainty as to the economic conditions in 2022 and 2023, which could impact the number of uninsured as well those with employer-sponsored insurance coverage, which could impact enrollment and premium levels.

Implementation Uncertainty. There is significant uncertainty as to how the program above would be implemented. How the program is ultimately implemented could have material impact on enrollment and costs. For example, the method and potential reconciliation of income data. For purposes of this analysis, Wakely assumed reported income would be used for determination of subsidy eligibility. The extent to which verification of income or after the benefit year reconciliation is different from those assumptions could impact the estimates contained in this report. Similarly, Wakely did not account for any interactions with the current Health Reimbursement Arrangements (HRA) requirements. Eligibility for the program based on employer offers could influence the number of firms that shift employees into the individual market and therefore impact the estimates. Finally, Wakely did not include any costs associated with implementation or assume that those costs (or other costs) would impact the available of funds for the programs analyzed.

Washington Health Benefits Exchange (WAHBE) Updated 2023 Premium State Subsidy Analysis by Scenario

2023 State Subsidies, (No ARP)	2023 Low	2023 Best	2023 High
Average Annual Enrollment*			
Exchange Enrollment	183,500	207,500	238,100
Federal + State Subsidy Enrollment (Group 1)	55,800	67,100	79,800
State Subsidy Only Enrollment (Group 2)	1,800	2,200	2,700
Total Receiving State Subsidies	57,600	69,300	82,500
% Receiving State Subsidies	31.4%	33.4%	34.6%
On-Exchange Take-up			
Total New Enrollment	6,800	10,200	14,600
Uninsured (QHP Eligible)	6,600	9,800	13,900
Uninsured (Undocumented)	n/a	n/a	n/a
Off-Exchange (QHP Eligible)	200	400	700
Per Member Per Month (PMPM) Amounts			
Group 1 Average Net Premium	\$48.43	\$51.71	\$53.15
Group 2 Average Net Premium	\$421.71	\$414.93	\$407.71
Group 1 Subsidy PMPM	\$75	\$75	\$75
Group 2 Subsidy PMPM	\$75	\$75	\$75
Group 1 Average Subsidy Utilization	\$50.47	\$51.08	\$51.03
Group 2 Average Subsidy Utilization	\$74.68	\$74.21	\$73.65
State Funding Amounts (\$M)			
Group 1 Funding	\$33.8	\$41.2	\$48.8
Group 2 Funding	\$1.6	\$1.9	\$2.4
Total Funding	\$35.4	\$43.1	\$51.2
Morbidity Impact from Subsidy Program	-0.5%	-1.1%	-1.9%

2023 State Subsidies (ARP)	2023 Low	2023 Best	2023 High	
Average Annual Enrollment*				
Exchange Enrollment	197,300	226,600	256,700	
Federal + State Subsidy Enrollment (Group 1)	70,900	85,800	99,700	
State Subsidy Only Enrollment (Group 2)	3,300	4,300	5,700	
Total Receiving State Subsidies	74,200	90,100	105,400	
% Receiving State Subsidies	37.6%	39.8%	41.1%	
On-Exchange Take-up				
Total New Enrollment	9,000	13,400	19,700	
Uninsured (QHP Eligible)	8,300	12,000	17,500	
Uninsured (Undocumented)	n/a	n/a	n/a	
Off-Exchange (QHP Eligible)	700	1,400	2,200	
Per Member Per Month (PMPM) Amounts				
Group 1 Average Net Premium	\$2.90	\$2.98	\$2.96	
Group 2 Average Net Premium	\$237.38	\$232.62	\$228.06	
Group 1 Subsidy PMPM	\$215	\$215	\$215	
Group 2 Subsidy PMPM	\$215	\$215	\$215	
Group 1 Average Subsidy Utilization	\$30.92	\$31.34	\$31.25	
Group 2 Average Subsidy Utilization	\$213.66	\$212.18	\$210.16	
State Funding Amounts (\$M)				
Group 1 Funding	\$26.3	\$32.3	\$37.4	
Group 2 Funding	\$8.4	\$11.0	\$14.3	
Total Funding	\$34.8	\$43.2	\$51.7	
Morbidity Impact from Subsidy Program	-0.6%	-1.3%	-2.2%	

*Note: Enrollment has been rounded to the nearest 100 members. Only relevant cohorts are displayed in the table.

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Washington Health Benefits Exchange (WAHBE) Updated 2023 Premium State Subsidy Analysis - Best Estimate Scenario Comparison

2023 State Subsidies, (No ARP)	2023 (Prior Version)	2023 (Updated Version)	Difference	2023 State Subsidies (ARP)	2023 (Prior Version)	2023 (Updated Version)
Average Annual Enrollment*	,	,		Average Annual Enrollment*	,	
Exchange Enrollment	218,100	207,500	-10,600	Exchange Enrollment	234,300	226,600
Federal + State Subsidy Enrollment (Group 1)	71,100	67,100	-4,000	Federal + State Subsidy Enrollment (Group 1)	88,800	85,800
State Subsidy Only Enrollment (Group 2)	2,100	2,200	100	State Subsidy Only Enrollment (Group 2)	3,300	4,300
Total Receiving State Subsidies	73,200	69,300	-3,900	Total Receiving State Subsidies	92,100	90,100
% Receiving State Subsidies	33.6%	33.4%		% Receiving State Subsidies	39.3%	39.8%
On-Exchange Take-up				On-Exchange Take-up		
Total New Enrollment	9,700	10,200	500	Total New Enrollment	11,500	13,400
Uninsured (QHP Eligible)	9,300	9,800	500	Uninsured (QHP Eligible)	10,500	12,000
Uninsured (Undocumented)	n/a	n/a	n/a	Uninsured (Undocumented)	n/a	n/a
Off-Exchange (QHP Eligible)	400	400	0	Off-Exchange (QHP Eligible)	1,000	1,400
Per Member Per Month (PMPM) Amounts				Per Member Per Month (PMPM) Amounts		
Group 1 Average Net Premium	\$44	\$52	\$8	Group 1 Average Net Premium	\$5	\$3
Group 2 Average Net Premium	\$407	\$415	\$8	Group 2 Average Net Premium	\$302	\$233
Group 1 Subsidy PMPM	\$75	\$75	\$0	Group 1 Subsidy PMPM	\$150	\$215
Group 2 Subsidy PMPM	\$75	\$75	\$0	Group 2 Subsidy PMPM	\$150	\$215
Group 1 Average Subsidy Utilization	\$47.69	\$51.08	\$3.40	Group 1 Average Subsidy Utilization	\$31.11	\$31.34
Group 2 Average Subsidy Utilization	\$74.29	\$74.21	(\$0.08)	Group 2 Average Subsidy Utilization	\$148.53	\$212.18
State Funding Amounts (\$M)			· · ·	State Funding Amounts (\$M)		
Group 1 Funding	\$40.7	\$41.2	\$0.4	Group 1 Funding	\$33.2	\$32.3
Group 2 Funding	\$1.8	\$1.9	\$0.1	Group 2 Funding	\$6.0	\$11.0
Total Funding	\$42.6	\$43.1	\$0.5	Total Funding	\$39.1	\$43.2
Morbidity Impact from Subsidy Program	-1.0%	-1.1%	-0.1%	Morbidity Impact from Subsidy Program	-1.1%	-1.3%

*Note: Enrollment has been rounded to the nearest 100 members. Only relevant cohorts are displayed in the table. *Note: Enrollment has been rounded to the nearest 100 members. Only relevant cohorts are displayed in the table.

Difference

-7,700 -3,000

1,000

-2,000

1,900 1,500

n/a 400

-\$2 -\$69 \$65 \$65 \$0.23

\$63.65

-\$0.9 \$5.0

\$4.1

-0.2%

Washington Health Benefits Exchange (WAHBE) 2023 Premium Assumptions (Source: WAHBE July 11, 2022)

Change in Second Lowest Cost Silver Plan Premium by County, 2022 to 2023

County	2022 SLCS Issuer	2022 SLCS Rate	2023 SLCS Issuer	2023 SLCS Rate	2023 Rate Increase
ADAMS	Coordinated Care	\$338.04	Coordinated Care	\$352.35	4.2%
ASOTIN	Coordinated Care	\$305.84	Coordinated Care	\$303.21	-0.9%
BENTON	Coordinated Care	\$297.78	Coordinated Care	\$294.27	-1.2%
CHELAN	Coordinated Care	\$338.03	Coordinated Care	\$352.35	4.2%
CLALLAM	UnitedHealth Care of OR	\$354.79	LifeWise	\$436.66	23.1%
CLARK	Molina	\$341.85	Regence BlueCross BlueShield OR	\$362.13	5.9%
COLUMBIA	Coordinated Care	\$305.84	Coordinated Care	\$319.65	4.5%
COWLITZ	Molina	\$332.78	Molina	\$351.29	5.6%
DOUGLAS	Coordinated Care	\$338.03	Coordinated Care	\$352.35	4.2%
FERRY	Coordinated Care	\$281.07	Community Health Plan WA	\$297.61	5.9%
FRANKLIN	Coordinated Care	\$297.78	Coordinated Care	\$294.27	-1.2%
GARFIELD	Coordinated Care	\$305.84	Coordinated Care	\$319.65	4.5%
GRANT	Coordinated Care	\$338.03	Coordinated Care	\$352.35	4.2%
GRAYS HARBOR	Regence WA	\$426.82	Premera	\$517.51	21.2%
ISLAND	LifeWise	\$350.45	Kaiser WA	\$355.28	1.4%
JEFFERSON	Coordinated Care	\$291.83	Coordinated Care	\$323.18	10.7%
KING	Molina	\$301.32	Kaiser WA	\$289.69	-3.9%
KITSAP	Coordinated Care	\$291.83	Coordinated Care	\$323.18	10.7%
KITTITAS	Coordinated Care	\$297.78	Community Health Plan WA	\$297.61	-0.1%
KLICKITAT	Coordinated Care	\$277.09	Coordinated Care	\$288.81	4.2%
LEWIS	Coordinated Care	\$291.83	Coordinated Care	\$306.56	5.0%
LINCOLN	Coordinated Care	\$281.07	Coordinated Care	\$304.47	8.3%
MASON	Coordinated Care	\$306.11	Coordinated Care	\$312.35	2.0%
OKANOGAN	Coordinated Care	\$338.03	Coordinated Care	\$352.35	4.2%
PACIFIC	Coordinated Care	\$291.83	Coordinated Care	\$306.56	5.0%
PEND OREILLE	Coordinated Care	\$281.07	Coordinated Care	\$304.47	8.3%
PIERCE	Coordinated Care	\$306.11	Coordinated Care	\$312.35	2.0%
SAN JUAN	LifeWise	\$366.16	LifeWise	\$388.63	6.1%
SKAGIT	LifeWise	\$350.45	Kaiser WA	\$355.28	1.4%
SKAMANIA	Molina	\$341.85	Coordinated Care	\$288.81	-15.5%
SNOHOMISH	Molina	\$298.31	Coordinated Care	\$294.89	-1.1%
SPOKANE	Coordinated Care	\$281.07	Coordinated Care	\$288.81	2.8%
STEVENS	Coordinated Care	\$281.07	Coordinated Care	\$288.81	2.8%
THURSTON	Coordinated Care	\$306.11	Community Health Plan WA	\$305.25	-0.3%
WAHKIAKUM	LifeWise	\$406.25	Coordinated Care	\$306.56	-24.5%
WALLA WALLA	Coordinated Care	\$305.83	Coordinated Care	\$295.78	-3.3%
WHATCOM	LifeWise	\$350.45	Kaiser WA	\$355.28	1.4%
WHITMAN	Coordinated Care	\$305.84	Coordinated Care	\$303.21	-0.9%
YAKIMA	Coordinated Care	\$297.78	Community Health Plan WA	\$297.61	-0.1%

Filed Rate Change in Premiums by Plan, 2022 to 2023

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71281WA1360010	4.9%	Y	71281WA1360007
71281WA1360011	4.9%	Y	71281WA1360007
71281WA1360012	4.9%	Y	71281WA1360007
71281WA1400001	6.1%	Ν	
80473WA0540001	4.8%	Ν	
80473WA0780001	6.5%	Ν	
80473WA0990001	4.3%	Ν	
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80473WA1000001	2.8%	Ν	
80473WA1000002	4.5%	Ν	
80473WA1000005	3.2%	Ν	
80473WA1000006	1.3%	Ν	
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80473WA1000008	3.6%	Ν	
80473WA1000009	5.8%	Ν	
84481WA0060001	6.8%	Y	84481WA0060005
84481WA0060004	10.5%	Ν	
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84481WA0060006	10.0%	Ν	
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84481WA0060008	6.9%	Y	84481WA0060007
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87718WA2170002	17.1%	Y	87718WA2170004
87718WA2170003	18.0%	Ν	
87718WA2170004	17.1%	Ν	
87718WA2170009	17.1%	Y	87718WA2170004
87718WA2170010	17.1%	Y	87718WA2170004
87718WA2170011	17.1%	Y	87718WA2170004
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87718WA2170013	9.7%	Ν	
87718WA2170014	3.1%	Ν	
87718WA2170015	18.3%	Ν	
87718WA2170016	9.7%	Y	87718WA2170013
87718WA2170017	3.1%	Y	87718WA2170014
87718WA2170018	17.1%	Y	87718WA2170004
87718WA2170019	9.7%	Y	87718WA2170013
87718WA2170020	3.1%	Y	87718WA2170014
87718WA2170021	17.1%	Ŷ	87718WA2170004
87718WA2170022	7.8%	N	
87718WA2170023	1.3%	N	
87718WA2170024	16.2%	N	
87718WA2200001	19.7%	N	

Wakely

Washington Health Benefits Exchange (WAHBE) 2023 Exchange Enrollment Build-Up

ARP Continues		Total Enrollment			Change			Comments
Year	Adjustment / Source	Low	Best	High	Low	Best	High	
2022	January Starting Data	226,302	226,302	226,302	-	-	-	
2022	Effectuation Adjustment	208,936	208,936	208,936	(17,366)	(17,366)	(17 <i>,</i> 366)	Adjustment for effectuated enrollment
2023	Medicaid Redetermination	208,936	216,106	221,840	-	7,170	12,904	Adjustment for anticipated Medicaid redetermination
2023	Baseline Enrollment Growth	202,938	213,700	228,510	(5,998)	(2 <i>,</i> 406)	6,670	Assumed organic YoY growth
2022	Other changes	188,249	213,253	236,992	(14,689)	(447)	8,482	SEP, FG, Enrollment Changes due to Premium Changes
2023	With State Subsidy	197,263	226,645	256,693	9,014	13,392	19,701	Addition of off-exchange and uninsured enrollment attracted by subsidies

ARP Discontinued		Total Enrollment			Change			Comments
Year	Adjustment / Source	Low	Best	High	Low	Best	High	
2022	January Starting Data	226,302	226,302	226,302	-	-	-	
2022	Effectuation Adjustment	195,781	195,781	195,781	(30,521)	(30,521)	(30,521)	Adjustment for effectuated enrollment & end of ARP subsidies
2023	Medicaid Redetermination	195,781	202,022	206,799	-	6,241	11,018	Adjustment for anticipated Medicaid redetermination
2023	Baseline Enrollment Growth	190,192	199,039	213,058	(5,589)	(2 <i>,</i> 983)	6,258	Assumed organic YoY growth
2022	Other changes	176,688	197,327	223,534	(13,504)	(1,712)	10,477	SEP, FG, Enrollment Changes due to Premium Changes
2023	With State Subsidy	183,517	207,524	238,118	6,829	10,197	14,584	Addition of off-exchange and uninsured enrollment attracted by subsidies