

# California Large Group Annual Aggregate Rate Data Report Form

(File through SERFF as a PDF or excel. If you enter data on a Word version of this document, convert to PDF before submitting the form. SERFF will not accept Word documents.

Note "Large Group Annual Aggregate Rate Data Report" in the SERFF "Filing Description" field)

The aggregate rate information submission form should include the following:

- 1) Company Name (Health Plan)
- 2) Rate Activity 12-month ending date
- 3) Weighted Average Rate Increase, and Number Enrollees subject to rate change
- 4) Summary of Number and Percentage of Rate Changes in Reporting Year by Effective Month
- 5) Segment Type
- 6) Product Type
- 7) Products Sold with materially different benefits, cost share
- 8) Factors affecting the base rate
- 9) Overall Medical Trend (Plain-Language Form)
- 10) Projected Medical Trend (Plain-Language Form)
- 11) Per Member per Month Costs and Rate of Changes over last five years  
- submit CA Large Group Historical Data Reporting Spreadsheet (Excel)
- 12) Changes in Enrollee Cost Sharing
- 13) Changes in Enrollee Benefits
- 14) Cost Containment and Quality Improvement Efforts
- 15) Number of products that incurred excise tax paid by the health plan
- 16) Covered Prescription Drugs  
- submit SB 17 - Large Group Prescription Drug Cost Reporting Form (Excel)
- 17) Other Comments

1) Company Name:

**Kaiser Permanente Insurance Company**

- 2) This report summarizes rate activity for the 12 months ending reporting year 2021.<sup>1</sup>
- 3) Weighted average annual rate increase (unadjusted)<sup>2</sup>
  - All large group benefit designs 5.9 %
  - Most commonly sold large group benefit design 7.7 %Weighted average annual rate increase (adjusted)<sup>3</sup>

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Provide information for January 1-December 31 of the reporting year.

<sup>2</sup> Average percent increase means the weighted average of the annual rate increases that were implemented (actual or a reasonable approximation when actual information is not available). The average shall be weighted by the number of enrollees/covered lives.

<sup>3</sup> "Adjusted" means normalized for aggregate changes in benefits, cost sharing, provider network, geographic rating area, and average age.

- All large group benefit designs 7.1 %
- Most commonly sold large group benefit design<sup>4</sup> 7.9 %

4) Summary of Number and Percentage of Rate Changes in Reporting Year by Effective Month

See Health and Safety Code section 1385.045(a) and Insurance Code section 10181.45(a)

1	2	3	4	5	6	7
Month Rate Change Effective	Number of Renewing Groups	Percent of Renewing Groups <i>(number for each month in column 2 divided by the overall total)</i>	Number of Enrollees/Covered Lives Affected by Rate Change <sup>5</sup>	Number of Enrollees/Covered Lives Offered Renewal During Month Without A Rate Change	Average Premium PMPM After Renewal	Weighted Average Rate Change Unadjusted
January	91	42%	957	0	\$986.72	4.6%
February	9	4%	250	0	\$913.46	1.8%
March	6	3%	23	0	\$884.16	7.5%
April	11	5%	190	0	\$894.68	0.2%
May	7	3%	34	0	\$950.15	6.1%
June	18	8%	2,468	0	\$480.77	8.0%
July	16	7%	119	0	\$1,169.57	5.5%
August	7	3%	73	0	\$1,096.34	5.1%
September	17	8%	163	0	\$1,327.80	6.8%
October	8	4%	104	0	\$1,087.56	4.2%
November	9	4%	62	0	\$1,347.87	14.9%
December	20	9%	71	0	\$1,304.96	7.0%
<b>Overall</b>	<b>219</b>	<b>100%</b>	<b>4,514</b>	<b>0</b>	<b>\$732.56</b>	<b>5.9%</b>

<sup>4</sup> Most commonly sold large group benefit design is determined at the product level. The most common large group benefit design, determined by number of enrollees should not include cost sharing, including, but not limited to, deductibles, copays, and coinsurance.

<sup>5</sup> The total number of enrollees/covered lives (employee plus dependents) affected by, or subject to, the rate change.

<sup>6</sup> Average percent increase means the weighted average of the annual rate increases that were offered (final rate quoted, including any underwriting adjustment) (actual or a reasonable approximation when actual information is not available). The average shall be weighted by the number of enrollees/covered lives in columns 4 & 5.

Place comments below:

(Include (1) a description (such as product name or benefit/cost-sharing description, and product type) of the most commonly sold benefit design, and (2) methodology used to determine any reasonable approximations used).

(1) The most commonly sold benefit design is EPO (based on number of members).  
 (2) The 2021 rates for groups that are not yet quoted are estimated using KPIC's standard rating methodology.

5) Segment type: Including whether the rate is community rated, in whole or in part

**See Health and Safety Code section 1385.045(c)(1)(B) and Insurance Code section 10181.45(c)(1)(B)**

1	2	3	4	5	6	7
Rating Method	Number of Renewing Groups	Percent of Renewing Groups <i>(number for each rating method in column 2 divided by overall total)</i>	Number of Enrollees/ Covered Lives Affected by Rate Change	Number of Enrollees/ Covered Lives Offered Renewal Without A Rate Change	Average Premium PMPM After Renewal	Weighted Average Rate Change Unadjusted
100% Community Rated (in whole)	186	85%	1,626	0	\$1,090.36	5.6%
Blended (in part)	28	13%	431	0	\$881.04	2.8%
100% Experience Rated	5	2%	2,457	0	\$469.73	7.3%
<b>Overall</b>	<b>219</b>	<b>100%</b>	<b>4,514</b>	<b>0</b>	<b>\$732.56</b>	<b>5.9%</b>

Comments: Describe differences between the products in each of the segment types listed in the above table, including which product types (PPO, EPO, HMO, POS, HDHP, other) are 100% community rated, which are 100% experience rated, and which are blended. Also include the distribution of covered lives among each product type and rating method.

POS/EPO - Renewal rates for groups with more than 1,000 members is 100% experienced rated. For groups with less than 1,000 members - that is, groups whose utilization is not fully credible, we use a blend of experience and community rating. For groups with less than 300 members it is 100% community rating.

PPO/OOA - All groups are community-rated.

<b>Distribution of Covered Lives</b>	<b>Product</b>				<b>Total</b>
	<b>PPO</b>	<b>EPO</b>	<b>POS</b>	<b>OOA</b>	
100% Community Rated (in whole)	27%	0%	9%	0%	<b>36%</b>
Blended (in part)	0%	0%	10%	0%	<b>10%</b>
100% Experience Rated	0%	53%	1%	0%	<b>54%</b>
<b>Overall</b>	<b>27%</b>	<b>53%</b>	<b>20%</b>	<b>0%</b>	<b>100%</b>

6) Product Type:

**See Health and Safety Code section 1385.045(c)(1)(C) and Insurance Code section 10181.45(c)(1)(C)**

1	2	3	4	5	6	7
Product Type	Number of Renewing Groups	Percent of Renewing Groups <i>(number for each product type in column 2 divided by overall total)</i>	Number of Enrollees/ Covered Lives Affected By Rate Change	Number of Enrollees/ Covered Lives Offered Renewal Without A Rate Change	Average Premium PMPM After Renewal	Weighted Average Rate Change Unadjusted
HMO	0	0%	0	0	N/A	N/A
PPO	124	57%	1,216	0	\$1,131.21	<b>5.3%</b>
EPO	2	1%	2,412	0	\$462.36	<b>7.7%</b>
POS	93	42%	886	0	\$921.02	<b>4.3%</b>
HDHP	0	0%	0	0	N/A	N/A
Other (describe)	0	0%	0	0	N/A	N/A
<b>Overall</b>	<b>219</b>	<b>100%</b>	<b>4,514</b>	<b>0</b>	<b>\$732.56</b>	<b>5.9%</b>

HMO – Health Maintenance Organization    PPO – Preferred Provider Organization  
 EPO – Exclusive Provider Organization                      POS – Point-of-Service  
 HDHP – High Deductible Health Plan with or without Savings Options (HRA, HSA)

Describe “Other” Product Types, and any needed comments here.

- 7) The number of plans sold during the 12-months that have materially different benefits, cost sharing, or other elements of benefit design.

**See Health and Safety Code section 1385.045(c)(1)(E) and Insurance Code section 10181.45(c)(1)(E)**

**Please complete the following tables. In completing these tables, please see definition of “Actuarial Value” in the document “SB546 – Additional Information”:**

**HMO**

Actuarial Value (AV)	Number of Plans	Covered Lives	Distribution of Covered Lives	Description of the type of benefits and cost sharing levels for each AV range
0.9 to 1.000	0	0	0%	N/A
0.8 to 0.899	0	0	0%	N/A
0.7 to 0.799	0	0	0%	N/A
0.6 to 0.699	0	0	0%	N/A
0.0 to 0.599	0	0	0%	N/A
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0%</b>	

**PPO**

Actuarial Value (AV)	Number of Plans	Covered Lives	Distribution of Covered Lives	Description of the type of benefits and cost sharing levels for each AV range
0.9 to 1.000	10	307	21%	\$250/\$500 DED; \$15/30% OV; 10% IP; \$15/\$40 RX
0.8 to 0.899	22	1,037	71%	\$500/\$1000 DED; \$25/30% OV; 10% IP; \$15/\$40 RX
0.7 to 0.799	5	117	8%	\$2800 DED; \$20/50% OV; 20% IP; \$15/\$40 RX
0.6 to 0.699	-	-	0%	N/A
0.0 to 0.599	-	-	0%	N/A
<b>Total</b>	<b>37</b>	<b>1,461</b>	<b>100%</b>	

**EPO**

Actuarial Value (AV)	Number of Plans	Covered Lives	Distribution of Covered Lives	Description of the type of benefits and cost sharing levels for each AV range
0.9 to 1.000	-	-	0%	N/A
0.8 to 0.899	2	2,412	100%	\$1400DED; 20%OP; 20%IP; 100%RX
0.7 to 0.799	-	-	0%	N/A
0.6 to 0.699	-	-	0%	N/A
0.0 to 0.599	-	-	0%	N/A
<b>Total</b>	<b>2</b>	<b>2,412</b>	<b>100%</b>	

## POS

Actuarial Value (AV)	Number of Plans	Covered Lives	Distribution of Covered Lives	Description of the type of benefits and cost sharing levels for each AV range
0.9 to 1.000	32	1,004	100%	\$1000/\$2000 DED; \$25/20%/40% OV; 20% IP; \$20/\$40 RX
0.8 to 0.899	-	-	0%	N/A
0.7 to 0.799	-	-	0%	N/A
0.6 to 0.699	-	-	0%	N/A
0.0 to 0.599	-	-	0%	N/A
<b>Total</b>	<b>32</b>	<b>1,004</b>	<b>100%</b>	

## HDHP

Actuarial Value (AV)	Number of Plans	Covered Lives	Distribution of Covered Lives	Description of the type of benefits and cost sharing levels for each AV range
0.9 to 1.000	0	0	0%	N/A
0.8 to 0.899	0	0	0%	N/A
0.7 to 0.799	0	0	0%	N/A
0.6 to 0.699	0	0	0%	N/A
0.0 to 0.599	0	0	0%	N/A
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0%</b>	

## Other (describe)

Actuarial Value (AV)	Number of Plans	Covered Lives	Distribution of Covered Lives	Description of the type of benefits and cost sharing levels for each AV range
0.9 to 1.000	-	-	0%	N/A
0.8 to 0.899	-	-	0%	N/A
0.7 to 0.799	-	-	0%	N/A
0.6 to 0.699	-	-	0%	N/A
0.0 to 0.599	-	-	0%	N/A
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0%</b>	

In the comment section below, provide the following:

- Number and description of standard plans (non-custom) offered, if any. Include a description of the type of benefits and cost sharing levels.
- Number of large groups with (i) custom plans and (ii) standard plans.

Place comments here:

(1) All of the plans are custom plans.

(2) There are 219 groups with custom plans and no group with standard plans.



8) Describe any factors affecting the base rate, and the actuarial basis for those factors, including all of the following:

See *Health and Safety Code section 1385.045(c)(2)* and *Insurance Code section 10181.45(c)(2)*

Factor	Provide actuarial basis, change in factors, and member months during 12-month period.
Geographic Region (describe regions)	<p>POS/EPO - The geographic location where members reside impacts group premiums. Northern California and Southern California have completely separate rating models due to different market and cost structure. Northern California is divided into three sub-regions, each with a different geographic factor. These geographic adjustments apply only to the manual rating methodology. The factors did not change in 2021.</p> <p>PPO/OOA - Rates are area-adjusted and area factors are based on zip code. The factors did not change in 2021.</p>
Age, including age rating factors (describe definition, such as age bands)	Health care costs depend on the member's age and gender due to variations in utilization and intensity pattern. Our age / gender factor slope is based on our book of business experience. The factors did not change in 2021.
Occupation	N/A
Industry	We use industry factors to reflect the health care cost differentials attributed to the industry classification. The factors did not change in 2021.
Health Status Factors, including but not limited to experience and utilization	Our base rates reflect the claims experience of the underlying population.
Employee, and employee and dependents, <sup>1</sup> including a description of the family composition used in each premium tier	For existing groups, our rating model produces rates on a per member per month (pmpm) basis. Within broad limits, the employer is free to choose the tier ratios used to convert pmpm rates to tiered rates.

<sup>7</sup> i.e. premium tier ratios

Enrollees' share of premiums	Rates may be adjusted for employer contribution.
Enrollees' cost sharing, including cost sharing for prescription drugs	We use benefit adjustment factors to reflect the cost sharing provisions of the employee benefit plan.
Covered benefits in addition to basic health care services and any other benefits mandated under this article	Employers may buy additional benefits for an additional premium.
Which market segment, if any, is fully experience rated and which market segment, if any, is in part experience rated and in part community rated	<p>POS/EPO - Generally groups averaging 1,000+ members during the experience period are 100% experience rated. Smaller groups receive a combination of experience rating and community rating.</p> <p>PPO/OOA - All groups are community-rated.</p>
Any other factor (e.g. network changes) that affects the rate that is not otherwise specified	<p>POS - Early retirees and COBRA members are expected to incur higher health care costs, and thus adjustments are included in rating. These adjustments apply only to the manual rating methodology and apply to all members of the group. The factors did not change in 2021.</p> <p>PPO/OOA and EPO – The adjustment for Early retirees and COBRA status does not apply.</p>

9) Overall large group medical allowed trend factor and trend factors by aggregate benefit category:

**a) Overall Medical Allowed Trend Factor**

“Overall” means the weighted average of trend factors used to determine rate increases included in this filing, weighting the factor for each aggregate benefit category by the amount of projected medical costs attributable to that category.

Allowed Trend: (Current Year) / (Current Year – 1)

6.9%
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**b) Medical Allowed Trend Factor by Aggregate Benefit Category**

The aggregate benefit categories are each of the following – hospital inpatient, hospital outpatient (including emergency room), physician and other professional services, prescription drugs from pharmacies, laboratory services (other than hospital inpatient), radiology services (other than hospital inpatient), other (describe).

*See Health and Safety Code section 1385.045(c)(3)(A) and Insurance Code section 10181.45(c)(3)(A)*

Hospital Inpatient <sup>2</sup>	7.0%
Hospital Outpatient (including ER)	7.0%
Physician/other professional services <sup>3</sup>	7.0%
Prescription Drug <sup>4</sup>	6.0%
Laboratory (other than inpatient) <sup>5</sup>	7.0%
Radiology (other than inpatient)	7.0%
Capitation (professional)	N/A
Capitation (institutional)	N/A
Capitation (other)	N/A
Other (describe)	7.0%(Ambulance, Home Health, SNF, DME, etc.)

<sup>2</sup> Measured as inpatient days, not by number of inpatient admissions.

<sup>3</sup> Measured as visits.

<sup>4</sup> Per prescription.

<sup>5</sup> Laboratory and Radiology measured on a per-service basis.

Please provide an explanation if any of the categories under 9(b) are zero or have no value.

N/A

10) Projected medical trend:

Use the same aggregate benefit categories used in item 9 – hospital inpatient, hospital outpatient (including emergency room), physician and other professional services, prescription drugs from pharmacies, laboratory services (other than hospital inpatient), radiology services (other than hospital inpatient), other (describe). Furthermore, within each aggregate category quantify the sources of trend, i.e. use of service, price inflation, and fees and risk.

**See Health and Safety Code section 1385.045(c)(3)(B) and Insurance Code section 10181.45(c)(3)(B)**

**Projected Medical Allowed Trend by Aggregate Benefit Category**

		Trend attributable to:			
Allowed Trend: (Current Year + 1) / (Current Year)	Current Year - Aggregate Dollars (PMPM)	Use of Services	Price Inflation	Fees and Risk	Overall Trend
Hospital Inpatient <sup>12</sup>	\$199.15	8.1%	1.9%	0%	10.2%
Hospital Outpatient (including ER)	\$188.04	7.6%	2.4%	0%	10.2%
Physician/other professional services <sup>13</sup>	\$137.36	4.9%	5.1%	0%	10.2%
Prescription Drug <sup>14</sup>	\$69.42	1.1%	4.8%	0%	6.0%
Laboratory (other than inpatient) <sup>15</sup>	\$35.54	4.9%	5.1%	0%	10.2%
Radiology (other than inpatient)	\$47.49	4.8%	5.2%	0%	10.2%
Capitation (professional)	\$0	N/A	N/A	N/A	N/A
Capitation (institutional)	\$0	N/A	N/A	N/A	N/A
Capitation (other)	\$0	N/A	N/A	N/A	N/A
Other (describe)	\$13.09	6.9%	3.1%	0%	10.2%
<b>Overall</b>	<b>\$690.09</b>	<b>6.2%</b>	<b>3.4%</b>	<b>0%</b>	<b>9.8%</b>

Please provide an explanation if any of the categories above are zero or have no value.

KPIC does not pay capitation.

<sup>12</sup> Measured as inpatient days, not by number of inpatient admissions.

<sup>13</sup> Measured as visits.

<sup>14</sup> Per prescription.

<sup>15</sup> Laboratory and Radiology measured on a per-service basis.

11) Complete the CA Large Group Historical Data Spreadsheet to provide a comparison of the aggregate per enrollee per month costs and rate changes over the last five years for each of the following:

- (i) Premiums
- (ii) Claims Costs, if any
- (iii) Administrative Expenses
- (iv) Taxes and Fees
- (v) Quality Improvement Expenses. Administrative Expenses include general and administrative fees, agent and broker commissions

**Complete CA Large Group Historical Data Spreadsheet - Excel**

**See Health and Safety Code section 1385.045(c)(3)(C) and Insurance Code section 10181.45(c)(3)(C)**

12) Changes in enrollee cost-sharing

Describe any changes in enrollee cost-sharing over the prior year associated with the submitted rate information, including both of the following:

**See Health and Safety Code section 1385.045(c)(3) (D) and Insurance Code section 10181.45(c)(3)(D)**

- (i) Actual copays, coinsurance, deductibles, annual out of pocket maximums, and any other cost sharing by the following categories: hospital inpatient, hospital outpatient (including emergency room), physician and other professional services, prescription drugs from pharmacies, laboratory services (other than hospital inpatient), radiology services (other than hospital inpatient), other (describe).

**Point of Service (POS) \* In-Network Tier**

**1) IRS Guidelines DME Accum Change for Diabetic Testing Supplies and Peak Flow Meters**

To comply with the IRS and the US Treasury Department issued Notice 2019-45 which expands the definition of preventive care services for HSA compliant plans, peak flow meters and diabetic testing supplies will no longer be subject to the deductible on all Commercial Non-Grandfathered plans.

Peak flow meters will move to the DMEDIAB benefit service to accommodate the change.

**2) Expanded Preventive Services: Labs and Screenings for Chronic Conditions**

To comply with the Internal Revenue Service (IRS) and US Treasury Department issued Notice 2019-45, which expands the list of preventive care benefits permitted to be provided without a deductible by high deductible health plans (HDHP), lab tests and screenings for specific chronic conditions allowed by IRS Notice 2019-45 will be added to Kaiser Permanente's National Preventive Care package.

These changes will apply not only to HDHP plans, but to all plans compliant with the Affordable Care Act (ACA) and to grandfathered plans that have adopted the ACA

preventive care package.

### **3) USPSTF Recommendation PrEP for Prevention of HIV**

To comply with the United States Preventive Services Task Force (USPSTF) Grade A recommendation to add coverage for human immunodeficiency virus (HIV) preexposure prophylaxis (PrEP) for the prevention of HIV infection, coverage for HIV PrEP for prevention of HIV infection will be added for members on ACA compliant plans who are at high risk of HIV acquisition, when prescribed by a plan provider. PrEP at \$0 for member on ACA compliant plans when prescribed by provider for prevention of HIV infection.

### **4) New Women's Preventive Service: Anxiety Screening**

To communicate the new preventive service for anxiety screening required under the Women's Preventive Service Guidelines supported by the Health Resources & Services Administration (HRSA), the addition of anxiety screening for women will be captured in the National Preventive Services flier, available on [kp.org/prevention](http://kp.org/prevention).

### **5) Exclusion of RX with OTC Equivalent**

To lower costs and ensure industry and program wide parity, pharmacy will implement a new policy to exclude prescription medications that have over-the-counter (OTC) equivalents.

The existing California Regional Pharmacy and Therapeutics (CA P&T) Committee prescription drug formulary management process will review and determine those prescription drugs with OTC equivalents included for exclusion. This exclusion folds into the existing formulary management process.

OTC equivalents are prescription products that have the same active ingredient, strength, and dosage form. Members requiring these medications will be able to purchase them at retail price without a provider's prescription. Members will move from their existing brand/generic cost shares to OTC retail price.

### **6) Dental Services Prior to Transplant**

To accommodate the National Transplant Services Advisory Council request for dental coverage expansion, Kaiser Foundation Health Plan will cover as medically necessary under the member's health plan, a common set of routine dental services for members who are potential transplant recipients and require pre-transplant dental evaluation and 'clearance' before being placed on the transplant wait list.

Services covered will be routine dental services necessary to ensure the oral cavity is clear of infection prior to being placed on the transplant waitlist, such as evaluations, relevant x rays, cleaning (fluoride treatment) and extractions.

Patient must be referred for transplant evaluation including authorization of services.

### **Point of Service (POS)\*, Preferred Provider Organization (PPO) and Out-of-Area (OOA) Contracted Network Tier and Out-of-Network Tier**

#### ***Non-grandfathered (NGF) Plans only***

The changes described below apply to non-Grandfathered plans only.

If a Kaiser Permanente plan was in place after the Affordable Care Act ("ACA") was signed into law on or after March 23, 2010, it's considered a "non-grandfathered" plan.

The following changes have been made as benefit enhancements:

a. Mental Health or Substance Use Disorder Treatment, Other Outpatient Items & Services

i. Mental Health or Substance Use Disorder Treatment, Other Outpatient Other Items & Services received at the Participating Provider tier will now be covered at no charge and not subject to any Deductible.

b. Telehealth Services expansion

i. Telehealth Services, when used as a mode of delivering otherwise Covered Services, will now be covered at the Participating Provider and the Non-Participating Provider tiers of the POS plans. Telehealth Services coverage for PPO plans has been expanded to include coverage at the Non-Participating Provider tier. The cost share will be the same as an in-person visit for that service. This change was effective all at once on January 1, 2020, regardless of renewal date.

c. Reconstructive Surgery for Craniofacial Conditions

i. Coverage of medically necessary dental or orthodontic services that are an integral part of reconstructive surgery for cleft palate have been expanded to also include coverage for dental and orthodontia reconstructive services for other craniofacial conditions, such as Apert, Pfeiffer and Crouzon Syndromes, and hemifacial microsomia.

II. Coverage of Preventive Services in accordance with Affordable Care Act (ACA) requirements

a. The preventive care services that are covered at no charge and not subject to any Deductible when received at the Participating Provider tier have been expanded to include coverage for the following:

i. Anxiety screening in adolescent and adult women, including those who are pregnant or postpartum.

ii. Tobacco use screening has been added to the coverage of tobacco-caused disease counseling and interventions. Please refer to your COI for a detailed list of the preventive benefits that are covered based on the ACA guidelines.

III. The list of covered items and services under Other Preventive Services has been expanded as a benefit enhancement to treat the following specified items as preventive care when they are provided to individuals diagnosed with specified chronic conditions:

a) Hemoglobin A1C testing when provided to treat individuals diagnosed with diabetes, covered at no charge and not subject to any Deductible when received at the Participating Provider tier

b) Retinopathy Screening when provided to treat individuals diagnosed with diabetes, covered at no charge and not subject to any Deductible when received at the Participating Provider tier



- c) Low Density Lipo-Protein (LDL) testing when provided to treat individuals diagnosed with heart disease, covered at no charge and not subject to any Deductible when received at the Participating Provider tier
- d) International Normalized Ratio (INR) testing when provided to treat individuals diagnosed with liver disease or bleeding disorders, covered at no charge and not subject to any Deductible when received at the Participating Provider tier
- e) Peak flow meters when prescribed to treat individuals diagnosed with asthma, not subject to any Deductible when received at the Participating Provider tier
- f) Glucometers including lancets, test strips, control solution and batteries when prescribed to treat individuals diagnosed with diabetes, not subject to any Deductible when received at the Participating Provider tier

**Grandfathered (GF) Plans**

If a Kaiser Permanente plan was in place before ACA was signed into law on March 23, 2010, it's considered a "grandfathered" plan. Grandfathered plans remain largely unchanged for plan years beginning on or after January 1, 2018.

The following changes have been made as benefit enhancements:

- a. Mental Health or Substance Use Disorder Treatment, Other Outpatient Items & Services
  - i. Mental Health or Substance Use Disorder Treatment, Other Outpatient Other Items & Services received at the Participating Provider tier will now be covered at no charge and not subject to any Deductible.
- b. Telehealth Services expansion
  - i. Telehealth Services, when used as a mode of delivering otherwise Covered Services, will now be covered at the Participating Provider and the Non-Participating Provider tiers of the POS plans. Telehealth Services coverage for PPO plans has been expanded to include coverage at the Non-Participating Provider tier. The cost share will be the same as an in-person visit for that service. This change was effective all at once on January 1, 2020, regardless of renewal date.
- c. Reconstructive Surgery for Craniofacial Conditions
  - i. Coverage of medically necessary dental or orthodontic services that are an integral part of reconstructive surgery for cleft palate have been expanded to also include coverage for dental and orthodontia reconstructive services for other craniofacial conditions, such as Apert, Pfeiffer and Crouzon Syndromes, and hemifacial microsomia.

**II. Coverage of Preventive Services in accordance with Affordable Care Act (ACA) requirements**

- a. The preventive care services that are covered at no charge and not subject to any Deductible when received at the Participating Provider tier have been expanded to include coverage for the following:
  - i. Anxiety screening in adolescent and adult women, including those who are pregnant or postpartum.

ii. Tobacco use screening has been added to the coverage of tobacco-caused disease counseling and interventions. Please refer to your COI for a detailed list of the preventive benefits that are covered based on the ACA guidelines.

*\* The In-Network portion of the Point-of-Service (POS) Plan is underwritten by Kaiser Foundation Health Plan, Inc. (KFHP). Kaiser Permanente Insurance Company (KPIC) underwrites the PPO and Indemnity tiers of the POS Plan. KPIC is a subsidiary of KFHP.*

- (ii) Any aggregate changes in enrollee cost sharing over the prior years as measured by the weighted average actuarial value based on plan benefits using the company's plan relativity model, weighted by the number of enrollees.<sup>16</sup>

The weighted average actuarial value increased by 0.1% from 88.8% in 2020 to 88.9% in 2021

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<sup>16</sup> Please determine weight average actuarial value base on the company's own plan relativity model. For this purpose, the company is not required to use the CMS standard model.

### 13) Changes in enrollee/insured benefits

Describe any changes in benefits for enrollees/insureds over the prior year, providing a description of benefits added or eliminated, as well as any aggregate changes as measured as a percentage of the aggregate claims costs. Provide this information for each of the following categories: hospital inpatient, hospital outpatient (including emergency room), physician and other professional services, prescription drugs from pharmacies, laboratory services (other than hospital inpatient), radiology services (other than hospital inpatient), other (describe).

See Health and Safety Code section 1385.045(c)(3)(E) and Insurance Code section 10181.45(c)(3)(E)

#### **Point of Service (POS) \* In-Network Tier**

##### **1) IRS Guidelines DME Accum Change for Diabetic Testing Supplies and Peak Flow Meters**

To comply with the IRS and the US Treasury Department issued Notice 2019-45 which expands the definition of preventive care services for HSA compliant plans, peak flow meters and diabetic testing supplies will no longer be subject to the deductible on all Commercial Non-Grandfathered plans.

Peak flow meters will move to the DMEDIAB benefit service to accommodate the change.

- The cost impact is \$0.05 PMPM

##### **2) Expanded Preventive Services: Labs and Screenings for Chronic Conditions**

To comply with the Internal Revenue Service (IRS) and US Treasury Department issued Notice 2019-45, which expands the list of preventive care benefits permitted to be provided without a deductible by high deductible health plans (HDHP), lab tests and screenings for specific chronic conditions allowed by IRS Notice 2019-45 will be added to Kaiser Permanente's National Preventive Care package.

These changes will apply not only to HDHP plans, but to all plans compliant with the Affordable Care Act (ACA) and to grandfathered plans that have adopted the ACA preventive care package.

- This change has little to no impact on aggregate claims cost.

##### **3) USPSTF Recommendation PrEP for Prevention of HIV**

To comply with the United States Preventive Services Task Force (USPSTF) Grade A recommendation to add coverage for human immunodeficiency virus (HIV) preexposure prophylaxis (PrEP) for the prevention of HIV infection, coverage for HIV PrEP for prevention of HIV infection will be added for members on ACA compliant plans who are at high risk of HIV acquisition, when prescribed by a plan provider. PrEP at \$0 for member on ACA compliant plans when prescribed by provider for prevention of HIV infection.

- This change has little to no impact on aggregate claims cost.

#### **4) New Women's Preventive Service: Anxiety Screening**

To communicate the new preventive service for anxiety screening required under the Women's Preventive Service Guidelines supported by the Health Resources & Services Administration (HRSA), the addition of anxiety screening for women will be captured in the National Preventive Services flier, available on [kp.org/prevention](http://kp.org/prevention).

- This change has little to no impact on aggregate claims cost.

#### **5) Exclusion of RX with OTC Equivalent**

To lower costs and ensure industry and program wide parity, pharmacy will implement a new policy to exclude prescription medications that have over-the-counter (OTC) equivalents.

The existing California Regional Pharmacy and Therapeutics (CA P&T) Committee prescription drug formulary management process will review and determine those prescription drugs with OTC equivalents included for exclusion. This exclusion folds into the existing formulary management process.

OTC equivalents are prescription products that have the same active ingredient, strength, and dosage form. Members requiring these medications will be able to purchase them at retail price without a provider's prescription. Members will move from their existing brand/generic cost shares to OTC retail price.

- This change has little to no impact on aggregate claims cost.

#### **6) Dental Services Prior to Transplant**

To accommodate the National Transplant Services Advisory Council request for dental coverage expansion, Kaiser Foundation Health Plan will cover as medically necessary under the member's health plan, a common set of routine dental services for members who are potential transplant recipients and require pre-transplant dental evaluation and 'clearance' before being placed on the transplant wait list.

Services covered will be routine dental services necessary to ensure the oral cavity is clear of infection prior to being placed on the transplant waitlist, such as evaluations, relevant x rays, cleaning (fluoride treatment) and extractions.

Patient must be referred for transplant evaluation including authorization of services.

- This change has little to no impact on aggregate claims cost. (Less than \$0.02 PMPM)

**Point of Service (POS)\*, Preferred Provider Organization (PPO) and Out-of-Area (OOA) Contracted Network Tier and Out-of-Network Tier**

***Non-grandfathered (NGF) Plans only***

The changes described below apply to non-Grandfathered plans only.

If a Kaiser Permanente plan was in place after the Affordable Care Act (“ACA”) was signed into law on or after March 23, 2010, it’s considered a “non-grandfathered” plan.

The following changes have been made as benefit enhancements:

a. Mental Health or Substance Use Disorder Treatment, Other Outpatient Items & Services

i. Mental Health or Substance Use Disorder Treatment, Other Outpatient Other Items & Services received at the Participating Provider tier will now be covered at no charge and not subject to any Deductible.

- This change has little to no impact on aggregate claims cost.

b. Telehealth Services expansion

i. Telehealth Services, when used as a mode of delivering otherwise Covered Services, will now be covered at the Participating Provider and the Non-Participating Provider tiers of the POS plans. Telehealth Services coverage for PPO plans has been expanded to include coverage at the Non-Participating Provider tier. The cost share will be the same as an in-person visit for that service. This change was effective all at once on January 1, 2020, regardless of renewal date.

- This change has little to no impact on aggregate claims cost.

c. Reconstructive Surgery for Craniofacial Conditions

i. Coverage of medically necessary dental or orthodontic services that are an integral part of reconstructive surgery for cleft palate have been expanded to also include coverage for dental and orthodontia reconstructive services for other craniofacial conditions, such as Apert, Pfeiffer and Crouzon Syndromes, and hemifacial microsomia.

- This change has little to no impact on aggregate claims cost.

II. Coverage of Preventive Services in accordance with Affordable Care Act (ACA) requirements

a. The preventive care services that are covered at no charge and not subject to any Deductible when received at the Participating Provider tier have been expanded to include coverage for the following:

i. Anxiety screening in adolescent and adult women, including those who are pregnant or postpartum.

- This change has little to no impact on aggregate claims cost.

ii. Tobacco use screening has been added to the coverage of tobacco-caused disease counseling and interventions. Please refer to

your COI for a detailed list of the preventive benefits that are covered based on the ACA guidelines.

- This change has little to no impact on aggregate claims cost.

III. The list of covered items and services under Other Preventive Services has been expanded as a benefit enhancement to treat the following specified items as preventive care when they are provided to individuals diagnosed with specified chronic conditions:

a. Hemoglobin A1C testing when provided to treat individuals diagnosed with diabetes, covered at no charge and not subject to any Deductible when received at the Participating Provider tier

- This change has little to no impact on aggregate claims cost.

b. Retinopathy Screening when provided to treat individuals diagnosed with diabetes, covered at no charge and not subject to any Deductible when received at the Participating Provider tier

- This change has little to no impact on aggregate claims cost.

c. Low Density Lipo-Protein (LDL) testing when provided to treat individuals diagnosed with heart disease, covered at no charge and not subject to any Deductible when received at the Participating Provider tier

- This change has little to no impact on aggregate claims cost.

d. International Normalized Ratio (INR) testing when provided to treat individuals diagnosed with liver disease or bleeding disorders, covered at no charge and not subject to any Deductible when received at the Participating Provider tier

- This change has little to no impact on aggregate claims cost.

e. Peak flow meters when prescribed to treat individuals diagnosed with asthma, not subject to any Deductible when received at the Participating Provider tier

- This change has little to no impact on aggregate claims cost.

f. Glucometers including lancets, test strips, control solution and batteries when prescribed to treat individuals diagnosed with diabetes, not subject to any Deductible when received at the Participating Provider tier

- This change has little to no impact on aggregate claims cost.

#### ***Grandfathered (GF) Plans***

If a Kaiser Permanente plan was in place before ACA was signed into law on March 23, 2010, it's considered a "grandfathered" plan. Grandfathered plans remain largely unchanged for plan years beginning on or after January 1, 2018.

The following changes have been made as benefit enhancements:

a. Mental Health or Substance Use Disorder Treatment, Other Outpatient Items & Services

i. Mental Health or Substance Use Disorder Treatment, Other Outpatient Other Items & Services received at the Participating Provider tier will now be covered at no charge and not subject to any Deductible.

- This change has little to no impact on aggregate claims cost.

b. Telehealth Services expansion

i. Telehealth Services, when used as a mode of delivering otherwise Covered Services, will now be covered at the Participating Provider and the Non-Participating Provider tiers of the POS plans. Telehealth Services coverage for PPO plans has been expanded to include coverage at the Non-Participating Provider tier. The cost share will be the same as an in-person visit for that service. This change was effective all at once on January 1, 2020, regardless of renewal date.

- This change has little to no impact on aggregate claims cost.

c. Reconstructive Surgery for Craniofacial Conditions

i. Coverage of medically necessary dental or orthodontic services that are an integral part of reconstructive surgery for cleft palate have been expanded to also include coverage for dental and orthodontia reconstructive services for other craniofacial conditions, such as Apert, Pfeiffer and Crouzon Syndromes, and hemifacial microsomia.

- This change has little to no impact on aggregate claims cost.

II. Coverage of Preventive Services in accordance with Affordable Care Act (ACA) requirements

a. The preventive care services that are covered at no charge and not subject to any Deductible when received at the Participating Provider tier have been expanded to include coverage for the following:

i. Anxiety screening in adolescent and adult women, including those who are pregnant or postpartum.

- This change has little to no impact on aggregate claims cost.

ii. Tobacco use screening has been added to the coverage of tobacco-caused disease counseling and interventions. Please refer to your COI for a detailed list of the preventive benefits that are covered based on the ACA guidelines.

- This change has little to no impact on aggregate claims cost.

*\* The In-Network portion of the Point-of-Service (POS) Plan is underwritten by Kaiser Foundation Health Plan, Inc. (KFHP). Kaiser Permanente Insurance Company (KPIC) underwrites the PPO and Indemnity tiers of the POS Plan. KPIC is a subsidiary of KFHP.*



#### 14) Cost containment and quality improvement efforts

Describe any cost containment and quality improvement efforts since prior year for the same category of health benefit plan (for this purpose, "category of health benefit plan" means product type, such as HMO, PPO, EPO, etc.). To the extent possible, describe any significant new health care cost containment and quality improvement efforts and provide an estimate of potential savings together with an estimated cost or savings for the projection period. Companies are encouraged to structure their response with reference to the cost containment and quality improvement components of "Attachment 7 to Covered California 2017 Individual Market QHP Issuer Contract:"

- 1.01 Coordination and Cooperation
- 1.02 Ensuring Networks are Based on Value
- 1.03 Demonstrating Action on High Cost Providers
- 1.04 Demonstrating Action on High Cost Pharmaceuticals
- 1.05 Quality Improvement Strategy
- 1.06 Participation in Collaborative Quality Initiatives
- 1.07 Data Exchange with Providers
- 1.08 Data Aggregation across Health Plans

**See Health and Safety Code section 1385.045(c)(3)(F) and Insurance Code section 10181.45(c)(3)(F), see also California Health Benefit Exchange, April 7, 2016 Board**

**Meeting materials:**

[http://board.coveredca.com/meetings/2016/407/2017%20QHP%20Issuer%20Contract\\_Attachment%207\\_Individual\\_4-6-2016\\_CLEAN.pdf](http://board.coveredca.com/meetings/2016/407/2017%20QHP%20Issuer%20Contract_Attachment%207_Individual_4-6-2016_CLEAN.pdf)

## **POS In-Network Tier and EPO**

### **1.01 Coordination and Cooperation and 1.05 Quality Improvement Strategy**

100% of our care is already delivered in an integrated health model. All Kaiser Permanente patients benefit from our integrated system, in which health conditions are managed in a robust and comprehensive delivery system. Members need not actively enroll in special programs to manage their health, as they are proactively identified using real time clinical information, after which they automatically receive outreach and preventive care. Our focus is to ensure members have their conditions under control before they present harmful and costly acute issues. Kaiser Permanente relies on our clinical experts to implement current evidence-based care recommendations, and individual care is always designed to deliver the greatest benefit and lowest risk to each member. Cases are managed on an individual basis, and as such, incur costs associated with the most appropriate care for each member. Our integrated model is designed to ensure that members are diagnosed early, are treated appropriately, and have access to the care they need. Systems supporting our success include:

- Team-based approach: Physicians and pharmacists can view each other's notes, monitor lab results, coordinate care plans, and resolve benefits issues to align treatment at every point of care — and they work together to assess the clinical evidence behind each new drug.
- Evidence-based care: Our clinical teams evaluate the most up-to-date recommendations to help ensure treatment is grounded in evidence-based guidelines. Through outcomes management we aim to improve the effectiveness and value of treatments.
- Efficient purchasing and distribution: Most of these drugs are dispensed directly through our national specialty pharmacy, rather than contracted facilities. This gives us leveraging power to negotiate directly with manufacturers, so any savings can be passed directly on to customers and members. In addition, we dispense select resource-intensive specialty therapies through our national specialty pharmacy.
- Integrated care: Kaiser Permanente's program seamlessly weaves comprehensive disease management into our care delivery model which, supported by our integrated system, technology, and dedicated care teams, ensures that patients with complex chronic conditions and multiple health issues receive proactive coordinated care to maintain optimal health with maximum convenience.

Kaiser Permanente's approach to population care is a proven model that improves the health of our members. We consistently score among the best in the nation on publicly reported quality measures, including those related to population health, and we are

dedicated to continuously improving our care delivery.

## **1.02 Ensuring Networks are Based on Value**

The vast majority of hospital care is provided to Kaiser Permanente members in Kaiser Foundation Hospitals. There are circumstances due to geographic considerations where there are large regions of low population density when it is necessary to have contracted plan hospitals. Geographic access and quality are the primary considerations in the development of these contracts. Kaiser Permanente considers the same quality priorities for Plan hospitals that are measured for Kaiser Foundation Hospitals (KFH) and include quality metrics such as rates of hospital acquired infections and performance on other quality indicators, measures of patient experience, electronic health record interoperability and others. Moreover, whenever possible, Permanente physicians provide care to Kaiser Permanente members and drive change and provide Medical Staff leadership in non-KFH plan hospitals, thereby improving care to all patients in these hospitals.

In addition to establishing expectations around quality, service, and efficiency in non-KFH Plan hospitals with the goal of delivering the same level of care as in our owned and operated facilities, Kaiser Permanente subject matter experts and leaders collaborate with leaders and staff at our Plan hospitals to share best practices and strategies to improve care. This shared expertise accelerates change and improves care for all California patients.

Value-based care is at the core of our delivery model and we continue ongoing improvement efforts to ensure enhanced value to our members and purchasers.

Quality and service are top priorities for Permanente physicians. Our physicians practice evidence-based medicine regardless of the setting in which they provide care. Our physicians bring this evidence-based care, team approach, and best practices into non-Kaiser hospitals and work collaboratively with our non-Kaiser partners to assure that our patients receive the best care possible.

In addition, Permanente Medical Group (PMG) physicians actively participate in medical staff activities in our plan hospitals, often serving as Department Chairs and even as the Chief of Staff. By providing this leadership, our PMG physicians promote a culture of safety, quality and service.

All hospitals in the KP network are expected to maintain a high standard of care - per regulatory requirements (NCQA, DMHC), policies and procedures, and hospital contract quality language.

- Credentialing process which includes an initial on-site visit to review quality standards of the clinicians and their facilities.
- Focused site reviews are conducted, as needed.
- KP quality leads maintain line of sight to quality metrics that may indicate a need to address issues, improve practices, reduce variation, spread success.
- Ongoing monitoring of member complaints and response, significant events, accreditation status, and regulatory sanctions.
- Should a contracted clinician fail to meet KP criteria, an action plan is developed and progress is reported, until all issues have been resolved.

We have a council that is responsible for presenting a set of core quality metrics and a standardized annual quality plan template to KP's governing body over quality assurance for KP facilities and contracted plan hospitals. Once the standard template and core metrics are approved by the quality committee, the plans to achieve the goal metrics are jointly developed by quality leads that have a contracted plan hospital and the quality lead at the contracted plan hospital. These jointly developed annual quality plans are presented to the quality committee for approval. Implementation of the approved quality plans and monitoring of the core metrics are done through the joint operating committees that govern the health services agreement between KP and the Plan Hospitals. KP Northern California and Southern California are both represented.

Additionally, each KP service area with a contracted plan hospital has a governance structure comprised of KP and contracted plan hospital leadership (administration, physician, quality):

- An executive oversight committee: scope includes strategic focus and process improvement
- A joint operations committee: scope includes sharing of operations best practices and ensuring common goal quality metrics are achieved

Kaiser Foundation Health Plan contracts with Kaiser Foundation Hospitals in a mutually exclusive arrangement, providing or arranging for hospital services. Within our integrated delivery system, a majority of the care we provide is delivered at our own facilities. As much as possible, we provide care as part of our integrated system - health plan, medical group, and hospital network. Only when a specific highly-specialized method of care is not available within our network do we contract with external Centers of Excellence.

To improve the clinical outcomes and health status of our members and to help ensure a high-quality care experience, Kaiser Permanente has stringent selection criteria for choosing Centers of Excellence. All our hospitals are licensed by the California Department of Health Services, Division of Licensing and Certification; accredited by The Joint Commission; and certified to receive federal funds for Medicare and Medi-Cal. Our medical center leadership continues to meet periodically with Plan hospital leaders to discuss common quality goals with our contracted partners.

All of our clinicians are expected to contribute to a culture of continuously improving care by taking responsibility for a variety of quality metrics. Clinical metrics include inpatient quality measures such as sepsis and stroke care; outpatient quality measures such as cancer screening and cardiovascular health; and patient safety measures such as surgical safety and hospital-acquired infections. Our philosophy, structure, and incentives enable our clinicians to work collaboratively to deliver comprehensive care, achieve superior clinical outcomes, and help members maximize their total health. We do not anticipate any barriers in continuing this work.

### **1.03 Demonstrating Action on High Cost Providers**

Kaiser Foundation Health Plan (KFHP) contracts exclusively with The Permanente Medical Group (TPMG) in Northern California and Southern California Permanente Medical Group (SCPMG) in a mutually exclusive relationship to provide comprehensive medical services to our California members. Most of the compensation KFHP pays is an annually negotiated per member per month amount (capitation rate). The remaining compensation is generally for actual costs, or a percentage thereof, for specific items,

such as leased equipment. This arrangement provides limitations on the potential gain or loss of each medical group.

Because KP is an integrated system, we manage cost variation with much more transparency of data than fee-for-service health plans. We compare cost and underlying drivers of cost, such as productivity, wage rates, and supply costs/patient day. We work to understand variation, eliminate inappropriate variation, spread best practices, and tightly manage expenses. Furthermore, as a prepaid delivery system, our is incented to be as efficient as possible — both from ensuring quality is high (since high quality is the most cost-effective care in the long run) to being operationally efficient.

#### **1.04 Demonstrating Action on High-Cost Pharmaceuticals**

Kaiser Permanente has pharmacy programs in place to support quality, cost, and value to our members. Our physicians and pharmacists collaborate and share information to prevent medication errors, improve prescription adherence, and lower costs. We own and operate inpatient, outpatient, and mail-order pharmacy services, and our integrated system gives us a distinct advantage when purchasing drugs because we can systematically shift market share to contracted, cost-effective alternatives within therapeutic drug classes. This enables us to negotiate advantageous pricing for select drugs, which helps to offset pharmacy cost increases overall and maintain competitively priced pharmacy benefits. In addition, our national warehousing capabilities allow us to purchase large quantities of drugs before price increases take effect, resulting in documented annual savings of millions of dollars. We also generate significant savings by operating our own centralized repackaging and processing facilities.

#### **1.06 Participation in Collaborative Quality**

For members and the public to have reliable information and better understand the quality of care we deliver, we share quality measurement outcomes on kp.org. As a way to compare our performance to other health plans, members and non-members have easy access to data about our quality and medical outcomes. Information on kp.org describes our organizational commitment to quality and safety, defines how quality is measured, and allows our members and the public to have reliable information about the quality of care we deliver. We also provide direct links to the websites of the credible independent health care organizations that evaluate us, many of which have provider network performance report cards and patient satisfaction surveys, including:

- National Committee for Quality Assurance (NCQA)
- The Joint Commission (TJC)
- Integrated Healthcare Association (IHA)
- The Centers for Medicare & Medicaid Services (CMS)
- State of California Office of the Patient Advocate (OPA)
- The California Cooperative Healthcare Reporting Initiative (CCHRI)

### **Data Exchange with Providers**

As the largest, most comprehensive civilian electronic health record (EHR) system in America, KP HealthConnect securely links Kaiser Permanente facilities across the nation, making each member's current medical record securely available when and where it is needed. KP HealthConnect enhances member safety by linking members and authorized caregivers with electronic medical records (EMR) and online resources with just the click of a mouse. KP HealthConnect's Care Everywhere functionality permits providers to obtain information about procedures, labs and care completed in other KP regions. With fast and easy collaboration, critical data such as the patient's allergies, current medications, and recent medical history may be accessed by a member's entire care team in real time.

Pharmacy records and lab results, among other data, are accessible around the clock by members and their providers, mitigating the possibility of error that can develop with handwritten documentation. Physicians and pharmacists see drug alerts, which warn them of adverse reactions that might occur if patients receive certain combinations of medications simultaneously. As a result, potential miscommunication can be circumvented, and clinicians are assisted in providing the proper protocols and treatment.

### **For POS, PPO and OOA Contracted Network Tier and Out-of-Network Tier:**

This response applies to Kaiser Permanente Insurance Company's (KPIC's) PPO and OOA products and tiers 2 and 3 of the POS product.

#### **I. Administration of Outpatient Prescription Drug Benefit by KPIC's Pharmacy Benefit Manager (PBM)**

Since 2017, KPIC's Pharmacy Benefit Manager (PBM) has continued full administration of KPIC's outpatient prescription drug benefit. This includes maintenance of the formulary, utilization of the PBM's Pharmacy & Therapeutics and Formulary Committee (P&T Committee), and adoption of its cost containment processes. KPIC formularies, pharmacy utilization management edits and supporting medication treatment guidelines are reviewed and approved by PBM's P&T Committee and are based upon a thorough review of the medical literature reflecting published treatment guidelines recommended by national medical organizations. The P&T Committee reviews key therapeutic drug categories on a continuous basis to ensure they reflect the most up to date medication treatment recommendations.

Drugs presented to the P&T Committee for consideration are reviewed on the following evidence-based criteria:

- 1) Safety, including concurrent drug utilization review (cDUR) when applicable,
- 2) Efficacy: the potential outcome of treatment under optimal circumstances,
- 3) Strength of scientific evidence and standards of practice through review of relevant information from the peer-reviewed medical literature, accepted national treatment guidelines, and expert opinion where necessary,
- 4) Cost-Effectiveness: the actual outcome of treatment under real life conditions including consideration of total health care costs, not just drug costs, through utilization of pharmacoeconomic principles and/or published pharmacoeconomic or outcomes research evaluations where available,
- 5) Relevant benefits of current formulary agents of similar use,

- 6) Condition of potential duplication of similar drugs currently on formulary,
- 7) Any restrictions that should be delineated to assure safe, effective, or proper use of the drug.

KPIC's PBM monitors the ability of the utilization management programs applied at point of sale to ensure that KPIC delivers a highly efficient cost effective pharmacy benefit program to our membership.

KPIC's PBM also received NCQA Utilization Management (UM) Accreditation in 2017. This accreditation demonstrates that KPIC's PBM has the systems, processes and personnel to conduct utilization management in accordance with the strictest quality standards with focus on quality through consumer protection and improvement in service to customers with emphasis that organizations continually work on quality improvement. Some areas of focus:

- The PBM has the quality improvement infrastructure needed to improve the UM functions and services provided to its members.
- The PBM has a well-structured UM program and makes utilization decisions affecting the health care of members in a fair, impartial and consistent manner.
- The PBM applies objective and evidence-based criteria and takes individual circumstances and the local delivery system into account when determining the medical appropriateness of health care services.
- The PBM continually assesses member and practitioner experience with its UM process to identify areas in need of improvement.

**Drugs requiring prior authorization:**

Prior authorization is generally applied to drugs that have multiple indications, qualify as Specialty medications per our protocol are high in cost, have a high abuse potential (topical testosterone) or have a significant safety concern.

**Drugs requiring step therapy:**

Selected prescription drugs require step therapy. The step therapy program encourages safe and cost-effective medication use. Under this program, a "step" approach is required to receive coverage for certain high-cost medications. Under step therapy, KPIC insureds may first need to try a proven, cost-effective medication before using a more costly treatment.

The step therapy program is a process that defines how and when a particular drug can be dispensed by requiring the use of one or more prerequisite drugs (1st line agents), as identified through the insured's drug history, prior to the use of another drug (2nd line agent). If the licensed prescribing provider determines that a first-line drug is not appropriate or effective, a second-line drug, may be covered after meeting certain conditions.

**II. Quality Management, Utilization Management, and Case Management by KPIC's TPA**

KPIC's TPA, Permanente Advantage (PA), provides quality management, utilization management, and case management of care and services provided to KPIC's insureds.

- 1) **Quality Management Program.** The purpose of the Quality Management Program Description (QMPD) for Permanente Advantage (PA) is to assess and oversee the quality of care and services provided to Kaiser Permanente Insurance Company (KPIC) members throughout the continuum of care by non-

KP practitioners and providers.

The scope of the PA QMPD is limited to Preferred Provider Organization (PPO) or Point of Service (POS) members receiving care by non-KP practitioners and providers. POS members must be utilizing their tier 2 or tier 3 benefits to fall under the PA QMPD, otherwise the oversight of their care will be performed by the KP Regional Quality Program.

The Program's activities are developed and implemented in compliance with state and federal regulations and are approved by the PA Quality Management Committee (QMC).

Permanente Advantage (PA) Board of Managers (PBAM) has granted authority to the QMC for oversight of the Quality Management Program. The QMC is responsible for oversight and direction of the Permanente Advantage QM Program. The QMC recommends policy decisions, reviews and evaluates the results of all QM activities, oversees implementation of action plans and ensures follow-up as appropriate. The QMC meets at least quarterly and may meet more frequently if deemed necessary by the Committee Chair or the PABM.

- a) The functions of the QMC include, but are not limited to:
  1. Monitoring of clinical cases by peer review.
  2. Approve the Quality Management Program Description and work plan annually.
  3. Review of clinical decision-making processes for resource utilization and quality of care referred from UM Committee (UMC).
  4. Monitors key clinical quality indicators and benchmarks and identifies areas requiring focused review.
  5. Monitor data and outcomes of member and provider satisfaction, complaints, grievances and appeals.
  6. Reviewing, approving, or facilitating physician and/or provider education.
  7. As appropriate, providing feedback to Regional and National Network management regarding provider network quality and/or access issues and/or education (Network is contracted with KPIC).
- b) Maintain a clearly defined Quality Management (QM) Program structure.
  1. Involve physicians in the QM Program through participation in the Quality Management Committee (QMC).
  2. Ensure adequate staff and resources are available for implementation and maintenance of the QM Program.
  3. Ensure that all appropriate quality issues are reported to the QMC.
  4. Ensure issues addressed by the QMC are communicated to the Permanente Advantage Board of Managers (PABM) to facilitate its oversight of the Program.
- c) Integrate the QM Program.
  1. Promote a quality improvement approach to issue resolution and process enhancement.
  2. Communicate the results of studies, audits, and surveys to all staff.
- d) Continuously improve the quality of care and services.
  1. Maintain no less than two (2) quality improvement projects per accreditation program that address performance improvement and/or



- opportunities to reduce errors.
- 2. Ensure accurate and valid data collected for QM activities.
- 3. Monitor adverse outcomes for trends and implement action plans as appropriate.
- 4. Encourage the use of clinical practice guidelines (nationally recognized) as appropriate.
- e) The members of the QM Committee include the following persons/representatives:
  - 1. PA Medical Director and QM Chairperson
  - 2. Federation Associate Medical Director for Quality
  - 3. PA Director of Care Management
  - 4. KFHP Resource Stewardship
  - 5. Behavioral Health Practitioner
  - 6. Physician representatives from KP regions

The Quality Management Program will be reviewed, revised and updated annually. The evaluation process includes a summary of activities accomplished over the year and the impact of the activities on the provision of patient care and service. The QM Program may be amended by a majority vote of the PA Board of Managers, QM Committee or upon recommendation of the PA Care Management Director and the Medical Director.

2. **Utilization Management.** The purpose of the PA Utilization Management (UM) Program Description is to identify components of the UM Program, roles and responsibilities of the UM staff, and to provide the framework for activities scheduled for the current year. PA has established a formal process for the oversight of resource utilization as defined in the UM Program Description and measured in the work plan and annual UM Program evaluation.

The PA UM Program will be applied equitably, and in compliance with existing Kaiser Permanente (KP) governance and administrative policies. Health care will be based on quality and appropriateness of care. Care will not be restricted on a cost basis and clinical review is not a guarantee of payment. Payment is always subject to member eligibility and available benefits at the date of service.

PA does not use financial incentives to encourage barriers to care or service and does not reward practitioners or other individuals conducting utilization review for issuing denials of coverage or service, or to promote under-utilization.

The UM Program Description will be updated, reviewed, and approved by the PA UM Committee, Medical Director, and Director of Care Management, annually or more frequently as necessary.

The purpose of the UM Program is to provide a comprehensive process in which reviews of inpatient and outpatient services are performed in accordance with the requirements of the Kaiser Permanente Insurance Company (KPIC) Group Policy (Certificate of Insurance and Schedule of Coverage). While the optimal scenario is for all Preferred Provider Organization (PPO) and Point of Service (POS) members to receive care within the KP delivery system, the PPO/POS environment is structured to allow such members to obtain care outside of that

system from either a KP-contracted provider network, or a provider of the member's choice. The UM Program is designed to assure the delivery of medically necessary, optimally achievable, quality patient care through appropriate utilization of resources in a cost effective and timely manner. The focus of the Program is to ensure efficiency and continuity by identifying, evaluating, monitoring, and correcting matters that affect the overall efficacy of the UM process. The Program's activities are developed and implemented in compliance with state and federal regulations and are approved by the PA Board of Managers (PABM) and the PA UM/QM Committee.

Permanente Advantage is URAC accredited in Health Utilization Management.

This Program provides for fair and consistent evaluation of medical necessity and appropriateness of care through the use of KP and nationally accepted clinical practice standards. KP practitioners are included in the UM processes through participation in the various UM/QM Committees, which are functional components of the Program.

- A. Maintain a clearly defined Utilization Management Program structure.
  - 1. Involve providers in the UM Program through participation in the UM Committee, and through regular written communication with providers about the program.
  - 2. Ensure adequate staff and resources are available for implementation and maintenance of the UM Program.
  - 3. Ensure issues addressed by the UM/QM Committees are communicated to the PABM, Quality of Care Committee, and the KPIC Board of Directors to facilitate Program oversight.
  - 4. Coordinate with Regional and National Network Management to educate contracted providers on policies, procedures, goals, and objectives of the UM/QM Program, and to ensure compliance
- B. Provide ongoing monitoring and evaluation to address and correct inefficient coordination of health care.
  - 1. Perform prospective review of specific health care services to ensure services are provided within established guidelines and benefits of the member's plan.
  - 2. Monitor, evaluate, and optimize health care resource utilization by applying evidence-based criteria for medical necessity review.
  - 3. Perform medical management for acute inpatient hospitalizations and skilled nursing facility care to include:
    - i. Pre-admission, admission, concurrent review, and discharge planning to ensure medical necessity, appropriate level of care, and timely services.
    - ii. Follow-up communication with patient, physician, and provider to ensure adherence to discharge plan, and avoidance of post discharge complications.
  - 4. Medical Director review of all potential or actual clinical denials, excluding denials due to non-eligibility and non-benefit coverage.
  - 5. Perform retrospective review of health care services rendered to

validate appropriateness of service.

- C. Identify members through screening criteria appropriate for case or disease management and develop interventions that ensure efficient delivery of care.
    - 1. Identify and manage members with catastrophic, complex, or chronic illnesses.
    - 2. Refer members with targeted diagnoses to disease management programs.
  - D. Integrate the UM Program within the QM Program, where appropriate.
    - 1. Monitor both inpatient and outpatient care for possible quality of care deficiencies, utilizing referral indicator screening criteria, and report to the QM department.
    - 2. Respond to member or provider complaints or Level 1 appeals after comprehensive and timely investigations associated with utilization issues.
    - 3. Perform peer review in conjunction with QM Program, when necessary.
  - E. Monitor for over and under-utilization trends that may lead to quality of care concerns and implement appropriate interventions when indicated.
    - 1. Analyze utilization, readmission, pharmacy, appeals and grievance, and claims data to identify adverse trends or recurrent patterns indicating over or under utilization.
    - 2. Measure effectiveness of interventions implemented to address over or under utilization, as indicated.
  - F. Promote legislative and regulatory compliance as applicable to the organizational structure and care delivery model.
    - 1. Utilize a continuous quality improvement approach in the development, implementation, and evaluation of the UM Program.
    - 2. Assure governmental and other regulatory guidelines, standards, and criteria are adhered to, and submit required documentation to demonstrate compliance.
3. **Case Management.** The purpose of the PA Case Management (CM) Program is to provide and ensure the necessary tools are available to the Case Manager from the initial assessment, development of treatment plan and ongoing management of the case managed member. The goal is to achieve the desired outcomes by providing quality care across a continuum enhancing quality of life and containing costs.

Case Management is defined by the Commission for Case Manager Certification (CCMC) as a collaborative process that assesses, plans, implements, coordinates, monitors, and evaluates the options and services required to meet an individual's health needs, using communication and available resources to promote quality, cost-effective outcomes.

Case Management will be performed on specifically identified members who have experienced a critical event or diagnosis requiring extensive use of resources and requires assistance in navigating the healthcare system to facilitate appropriate delivery of care and services.

Case Management is a service available to all Kaiser Permanente Insurance Company (KPIC) members. Members have the right to decline participation or

dis-enroll from the Case Management Program.

Permanente Advantage is URAC accredited in Case Management.

**a) Member Identification** - Members are identified for referrals to the Case Management Program via several data and personnel sources. This includes but is not limited to:

- i. Claims data
- ii. Auth data
- iii. Physicians, providers, discharge planners, vendors
- iv. PA Care Management staff
- v. Other Kaiser staff
- vi. Disease Management program
- vii. Member

**b) Assessment**

Members who are enrolled in the Case Management Program are engaged in a detailed documented assessment of overall health status and condition specific issues pertaining to:

- i. Clinical history
- ii. Activities of daily living (ADL)
- iii. Mental Health status
- iv. Life planning
- v. Cultural and linguistic needs, preferences or limitations
- vi. Caregiver resources
- vii. Benefits

**c) Problem Identification**

Member, family and the healthcare team are essential participants in problem identification

Problems identified for Case Management intervention where members outcomes can be positively influenced includes but is not limited to:

- i. Lack of established or ineffective treatment plan
- ii. compromised patient safety
- iii. inappropriate utilization of services
- iv. alterations in function
- v. non-adherence to medication or treatment
- vi. lack of social or financial resources

Identification of referrals to Regional Kaiser Permanente (KP) Disease Management program

**d) Planning**

Collaboration with member, family and healthcare team results in development of a Case Management plan with ensuing follow-up dates determined by evidence-based algorithms utilized in the Case Management Documentation system to include:

- i. Development of a Case Management plan including short and long term goals
- ii. Identification of barriers to meeting or complying with plan
- iii. Development of follow-up schedule and communication with member and physician
- iv. Development and communication of self management plans for members
- v. Process to assess progress against the case management plans

**e) Monitoring**

Develops a process of ongoing assessment and documentation to monitor the quality of care, services and products delivered to the member. Assesses if the goals of the Case Management plan are achieved, remain appropriate and realistic and revise if appropriate.

**f) Evaluation/Measurement**

Employs a methodology designed to measure healthcare and case management process focusing on the client's response to the case management plan. The evaluation process occurs over specific time frames and is a continuous process. The evaluation process encourages in-put from the member, family and healthcare team to appropriately determine the impact of case management and healthcare interventions.

**g) Outcomes**

Case Management is a goal-directed process. Identification and implementation of changes in the Care Management plan to produce outcomes that are positive, measurable and goal-oriented.

15) Excise tax incurred by the health plan

Describe for each segment the number of products covered by the information that incurred the excise tax paid by the health plan - applicable to year 2020 and later.

*See Health and Safety Code section 1385.045(c)(3)(G) and Insurance Code section 10181.45(c)(3)(G)*

N/A
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- 16) Complete the SB 17 - Large Group Prescription Drug Cost Reporting Form to provide the information on covered prescription drugs dispensed at a plan pharmacy, network pharmacy or mail order pharmacy for outpatient use for each of the following:
- (i) Percent of Premium Attributable to Prescription Drug Costs
  - (ii) Year-Over-Year Increase, as Percentage, in Per Member Per Month, Total Health Plan Spending
  - (iii) Year-Over-Year Increase in Per Member Per Month Costs for Drug Prices Compared to Other Components of Health Care Premium
  - (iv) Specialty Tier Formulary List
  - (v) Percent of Premium Attributable To Drugs Administered in a Doctor's Office, if available
  - (vi) Health Plan/Insurer Use of a Prescription Drug (Pharmacy) Benefit Manager, if any

**Complete SB 17 - Large Group Prescription Drug Cost Reporting Form - Excel**

*See Health and Safety Code section 1385.045(c)(4)(A), 1385.045(c)(4)(B), 1385.045(c)(4)(C) and Insurance Code section 1385.045(c)(4)(A), 1385.045(c)(4)(B), 1385.045(c)(4)(C)*

17) Other Comments

Provide any additional comments on factors that affect rates and the weighted average rate changes included in this filing.

None