California Large Group Annual Aggregate Rate Data Report Form

Version 4, July 16, 2018

(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:

Aetna Life Insurance Company

2) This report summarizes rate activity for the 12 months ending reporting year 2018.
3) Weighted average annual rate increase (unadjusted)[1]
   - All large group benefit designs 9.8 %
   - Most commonly sold large group benefit design 9.8 %

   Weighted average annual rate increase (adjusted)[2]
   - All large group benefit designs 10.9 %
   - Most commonly sold large group benefit design[3] 11.0 %

[1] 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.
[2] "Adjusted" means normalized for aggregate changes in benefits, cost sharing, provider network, geographic rating area, and average age.

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 *(number for each month in column 2 divided by overall total)*	Number of Enrollees/ Covered Lives Affected by Rate Change[4]	Number of Enrollees/ Covered Lives Offered Renewal During Month Without A Rate Change	Average Premium PMPM After Renewal	Weighted Average Rate Change Unadjusted[5]
January	268	44.2%	95,898	0	$583.46	10.1%
February	15	2.5%	1,258	0	$924.00	6.9%
March	24	4.0%	2,415	0	$582.00	8.6%
April	30	5.0%	4,319	0	$650.41	10.3%
May	27	4.5%	3,036	0	$637.58	9.0%
June	35	5.8%	5,574	0	$565.92	6.7%
July	44	7.3%	7,942	0	$604.45	6.6%
August	34	5.6%	4,706	0	$613.10	8.9%
September	35	5.8%	3,296	0	$588.39	11.6%
October	25	4.1%	3,388	0	$668.77	10.6%
November	25	4.1%	3,781	0	$590.08	11.6%
December	44	7.3%	5,143	0	$545.94	12.2%
Overall	606	100%	140,756	0	$592.16	9.8%

[3] 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.

[4] The total number of enrollees/covered lives (employee plus dependents) affected by, or subject to, the rate change.

[5] 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 common plan design is a PPO plan with $1,000 deductible and 80% coinsurance.
(2) Approximations are derived from rating factors and underwriting reports.

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 *(number for each rating method in column 2 divided by overall total)*	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)	103	17.0%	22,415	0	$525.03	9.8%
Blended (in part)	382	63.0%	35,986	0	$623.20	9.5%
100% Experience Rated	121	20.0%	82,355	0	$596.86	9.9%
Overall	606	100%	140,756	0	$592.16	9.8%

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.

All products types are offered for each segment.

Membership distribution is as follows:

Segment	**PPO**	**EPO**	**Other-Indemnity**
100% Community Rated (in whole)	16.3%	6.7%	5.1%
Blended (in part)	25.8%	19.9%	1.3%
100% Experience Rated	57.9%	73.4%	93.6%

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 *(number for each product type in column 2 divided by overall total)*	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						
PPO	600	91.9%	136,057	0	$589.80	9.8%
EPO	26	4.0%	4,073	0	$648.11	9.7%
POS						
HDHP						
Other (describe)	27	4.1%	626	0	$740.97	7.3%
Overall	653	100%	140,756	0	$592.16	9.8%

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.

"Other" product type reflects the Aetna Traditional Choice (Indemnity) plan where members have the freedom to choose any recognized provider for covered services without a referral. The plan coinsurance percent is the same, regardless of whether a provider is contracted with Aetna or not. Plan sponsors save if a member obtains services from network providers who we reimburse based on their contracted fee schedule.

HDHP is included in the other product categories.

The total number of groups in 6) above does not match the total number of groups in 5) because a group may have members enrolled in more than one product (for example, PPO and EPO). In this case, the group is counted twice in 6), once under EPO and once under PPO.

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				
0.8 to 0.899				
0.7 to 0.799				
0.6 to 0.699				
0.0 to 0.599				
Total			100%	

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	2,342	37,555	27.6%	Ded $250, OOP $2000, Coinsurance 90%
0.8 to 0.899	5,656	65,295	48.0%	Ded $1000, OOP $3500, Coinsurance 80%
0.7 to 0.799	2,605	30,832	22.7%	Ded $3000, OOP $4000, Coinsurance 80%
0.6 to 0.699	340	2,375	1.7%	Ded $5500, OOP $6500, Coinsurance 80%
0.0 to 0.599	N/A	N/A	N/A	N/A
Total	10,943	136,057	100%	N/A

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	181	2,202	54.1%	Ded $100, OOP $2500, Coinsurance 90%
0.8 to 0.899	107	1,871	45.9%	Ded $500, OOP $3500, Coinsurance 90%
0.7 to 0.799	N/A	N/A	N/A	N/A
0.6 to 0.699	N/A	N/A	N/A	N/A
0.0 to 0.599	N/A	N/A	N/A	N/A

Total	288	4,073	100%	N/A

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				
0.8 to 0.899				
0.7 to 0.799				
0.6 to 0.699				
0.0 to 0.599				
Total			100%	

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				
0.8 to 0.899				
0.7 to 0.799				
0.6 to 0.699				
0.0 to 0.599				
Total			100%	

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	10	273	43.6%	Ded $250, OOP $1000, Coinsurance 90%
0.8 to 0.899	18	210	33.6%	Ded $500, OOP $3000, Coinsurance 80%
0.7 to 0.799	14	143	22.9%	Ded $2500, OOP $5000, Coinsurance 70%
0.6 to 0.699	N/A	N/A	N/A	N/A
0.0 to 0.599	N/A	N/A	N/A	N/A
Total	42	626	100%	N/A

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:

Standard Plans	Groups Sold
EPO Ded $1000/N/A, OOP $2500/N/A, Coins 80%/N/A, PCP $25, SPC $50	1
OAMC Ded $100/200, OOP $1500/3000, Coins 90%/70%, PCP $10, SPC $20	1
OAMC Ded $100/200, OOP $1500/3000, Coins 90%/70%, PCP $15, SPC $30	2
OAMC Ded $100/200, OOP $1500/3000, Coins 90%/70%, PCP $20, SPC $40	3
OAMC Ded $250/500, OOP $2000/4000, Coins 90%/70%, PCP $10, SPC $20	20
OAMC Ded $250/500, OOP $2000/4000, Coins 90%/70%, PCP $20, SPC $20	20
OAMC Ded $500/1000, OOP $2000/4000, Coins 90%/70%, PCP $15, SPC $25	13
OAMC Ded $500/1000, OOP $2000/4000, Coins 80%/60%, PCP $10, SPC $20	7
OAMC Ded $500/1000, OOP $3000/6000, Coins 80%/60%, PCP $15, SPC $30	16
OAMC Ded $500/1000, OOP $2000/4000, Coins 80%/60%, PCP $20, SPC $40	6
OAMC Ded $500/1000, OOP $2000/4000, Coins 80%/60%, PCP $20, SPC $20	37
OAMC Ded $750/1500, OOP $3000/6000, Coins 90%/70%, PCP $20, SPC $40	12
OAMC Ded $750/1500, OOP $3000/6000, Coins 80%/60%, PCP $20, SPC $40	29
OAMC Ded $1000/2000, OOP $3500/7000, Coins 80%/60%, PCP $25, SPC $50	39
OAMC Ded $1000/2000, OOP $4000/8000, Coins 70%/50%, PCP $30, SPC $50	2
OAMC Ded $1500/2700, OOP $3000/7500, Coins 90%/70%, PCP 90%, SPC 90%	1
OAMC Ded $1500/2700, OOP $3000/7500, Coins 80%/60%, PCP 80%, SPC 80%	2
OAMC Ded $1500/3000, OOP $5000/10000, Coins 70%/50%, PCP $30, SPC $50	20
OAMC Ded $2000/2700, OOP $4000/7500, Coins 80%/60%, PCP 80%, SPC 80%	1
OAMC Ded $2000/4000, OOP $4000/8000, Coins 70%/50%, PCP $30, SPC $50	20
OAMC Ded $2700/5000, OOP $3000/7500, Coins 90%/70%, PCP 90%, SPC 90%	20
OAMC Ded $2700/5000, OOP $4000/8000, Coins 80%/60%, PCP 80%, SPC 80%	32
OAMC Ded $3000/6000, OOP $5000/10000, Coins 80%/60%, PCP $20, SPC $40	1
OAMC Ded $4000/8000, OOP $5500/11000, Coins 70%/50%, PCP 70%, SPC 70%	4
OAMC Ded $5000/10000, OOP $6550/13000, Coins 80%/60%, PCP 80%, SPC 80%	4
OAMC Ded $5500/11000, OOP $6550/13100, Coins 90%/70%, PCP 90%, SPC 90%	1
PPO Ded $500/1000, OOP $2000/4000, Coins 80%/60%, PCP $20, SPC $20	5
PPO Ded $2700/5250, OOP $4000/8000, Coins 80%/60%, PCP 80%, SPC 80%	4

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)	Geographic regions are based on counties and cost differences between regions. Area factors are developed using Aetna's book of business data. Area factors were changed slightly. This change was revenue neutral.
Age, including age rating factors (describe definition, such as age bands)	Age rating factors vary by age and gender, and are developed using Aetna's book of business data. Age rating factors were changed based on recent experience. This change in age/gender factors was revenue neutral.
Occupation	Occupation rating factors are considered under the same umbrella as industry factors.
Industry	Industry factors vary by SIC code, and are developed using Aetna's book of business data. Industry factors have not changed during the 12-month period.
Health Status Factors, including but not limited to experience and utilization	Member-level prospective risk scores used in manual rating are derived from claims history and diagnosis data. Risk score methodology has not changed during the 12-month period.
Employee, and employee and dependents,[6] including a description of the family composition used in each premium tier	Premium tiers are as follows: Employee Only, Employee + Spouse, Employee + Children, and Employee + Family Premium tiers have not changed during the 12-month period.
Enrollees' share of premiums	There are no rating factors based on enrollees' share of premiums.
Enrollees' cost sharing, including cost sharing for prescription drugs	Benefit pricing factors based on enrollee cost sharing vary according to plan design. The majority of business is under custom plans.
Covered benefits in addition to basic health care services and any other benefits mandated under this article	Custom benefit riders are offered on a case by case basis.

[6] i.e. premium tier ratios

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	All large group market segments use a credibility table based on number of covered lives to determine whether the group is fully experience rated or partially community rated.
Any other factor (e.g. network changes) that affects the rate that is not otherwise specified	Network savings factor for narrow network products were revised based on contracting and cost analysis.

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

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)

9.9%

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	10.9%
Hospital Outpatient (including ER)	10.6%
Physician/other professional services	7.4%
Prescription Drug	12.7%
Laboratory (other than inpatient)	10.9%
Radiology (other than inpatient)	10.9%
Capitation (professional)	N/A
Capitation (institutional)	N/A
Capitation (other)	N/A
Other (describe)	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

Allowed Trend: (Current Year + 1) / (Current Year)		Trend attributable to:			
	Aggregate Dollars (PMPM)	Use of Services	Price Inflation	Fees and Risk	Overall Trend
Hospital Inpatient[7]	$114.59	3.9%	7.6%		11.8%
Hospital Outpatient (including ER)	$88.12	3.7%	6.2%		10.2%
Physician/other professional services[8]	$171.15	2.8%	5.1%		8.0%
Prescription Drug[9]	$92.72	1.5%	10.9%		12.5%
Laboratory (other than inpatient)[10]	Rolled up in above categories	3.7%	6.2%		10.2%
Radiology (other than inpatient)	Rolled up in above categories	3.7%	6.2%		10.2%
Capitation (professional)	N/A	N/A	N/A		N/A
Capitation (institutional)	N/A	N/A	N/A		N/A
Capitation (other)	N/A	N/A	N/A		N/A
Other (describe)	N/A	N/A	N/A		N/A

[7] Measured as inpatient days, not by number of inpatient admissions.
[8] Measured as visits.
[9] Per prescription.
[10] Laboratory and Radiology measured on a per-service basis.

Overall	$466.58	3.0%	7.0%		10.2%

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).

Any cost-sharing changes are initiated by the client, and therefore vary on a case by case basis.

(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.[11]

Aggregate change in enrollee cost sharing for all benefit categories on renewal as measured by Aetna's internal benefit pricing model is worth approximately -1.0%.

[11] 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)

There were no changes to in benefits over the prior year.

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. 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/2016/4-07/2017%20QHP%20Issuer%20Contract_Attachment%207__Individual_4-6-2016_CLEAN.pdf

	Cost Containment	Quality
Value Based P4P (Integrated Healthcare Association): Applicable to HMO products. Rewards IPAs for cost efficiency and quality.	Yes	Yes
Pay for Performance Program – Physician/Hospital: Rewards physician groups or hospitals for meeting performance metrics based on both efficiency and quality.	Yes	Yes
Patient Centered Medical Home Program: Rewards physician groups for effectively managing the health of a population based on measurement of both cost efficiency and quality metrics.	Yes	Yes
High Performance Network/ACO Program model: Rewards health systems for effectively managing the health of a population based on measurement of both overall medical costs and quality metrics.	Yes	Yes

Institutes of Quality/Institutes of Excellence – Organ transplant, Bone Marrow Transplant; Bariatric; Orthopedic, Cardiac: Providers are selected for participation in these networks based on volume/outcomes and cost criteria.	Yes	Yes
Oncology Cost/Quality Improvement: Shared savings model in use with oncology groups, rewards providers for following clinical guidelines/evidence based medicine.	Yes	Yes
In-Network Behavioral Health Cost/Quality: Focused on managing costs and quality associated with Autism, Substance Abuse and Inpatient Behavioral Health confinement.	Yes	Yes
Out of Network ASC and Behavioral Health Costs: Cost containment program focuses on over-billing. Involves special claims oversight, network review and litigation.	Yes	Yes
Health Improvement for High Risk Members: This program identifies members with higher morbidity and engages them with their health care provider through outreach and a health assessment.	Yes	Yes
Other Cost Containment Initiatives: Aetna defines multiple additional market level and national cost reduction actions annually or more frequently as needed.	Yes	Yes

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)

Not Applicable.

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.

N/A