HEALTH WEALTH CAREER

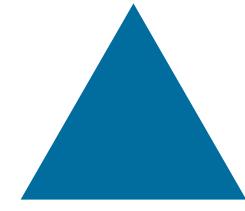
## CALENDAR YEAR 2019 HEALTHCHOICES

PHYSICAL HEALTH DATABOOK: SOUTHEAST ZONE SOUTHWEST ZONE LEHIGH/CAPITAL ZONE NORTHEAST ZONE NORTHWEST ZONE

FEBRUARY 9, 2018

Commonwealth of Pennsylvania





MAKE TOMORROW, TODAY



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## 1 INTRODUCTION

The purpose of this databook is to provide the HealthChoices Physical Health managed care organizations (PH-MCOs) historical summarized data for the HealthChoices program, which will be used in capitation rate setting. The Commonwealth of Pennsylvania's (Commonwealth) HealthChoices program operates mandatory Medicaid managed care in five zones: Southeast (SE), Southwest (SW), Lehigh/Capital (LC), Northeast (NE), and Northwest (NW) zones. The databook provided represents the physical health (PH) services (including maternity services) covered in the HealthChoices program for calendar year (CY) 2016 that were the responsibility of the participating PH-MCOs for each of the five zones. This CY 2016 databook will serve as the base data for development of the CY 2019 HealthChoices PH capitation rates.

Additionally, this databook provides information on the methodology that Mercer Government Human Services Consulting (Mercer), a part of Mercer Health & Benefits LLC, will use to develop the prospective CY 2019 capitation rates for the HealthChoices PH program. Mercer produced this databook with input from the Commonwealth's Department of Human Services (Department).

Historically, audited financial data submitted by the PH-MCOs was used as the base data for HealthChoices PH rate setting. Starting in CY 2019 and in compliance with guidance from the Center for Medicare & Medicaid Services, Mercer has moved to using an encounter base for purposes of capitation rate setting. PH-MCO submitted PROMISe<sup>™</sup> encounters with incurred dates of January 1, 2016 through December 31, 2016 and with runout of September 30, 2017 are summarized in this databook and will be utilized as the base data for development of the CY 2019 HealthChoices PH capitation rates.

Use of encounter data will allow for a greater level of detail of analysis and review within the rate development process. For CY 2019, the encounter data was validated against PH-MCO audited financial data and deemed to be appropriate and usable for rate setting. To account for underreporting or completion, encounters will be adjusted using audited financial reports within the rate setting process. For purposes of this databook, no financial adjustments were applied.

The CY 2016 PH-MCO experience contained in this databook is representative of the rate cell and rating region structure that is expected to be in place during the CY 2019 rating period.

The following table illustrates the county composition of each rating region. Counties displayed below represent prospective region mappings:

HEALTHCHOICES ZONE	RATE REGION 1	RATE REGION 2
SE Zone	Delaware and Philadelphia counties	Bucks, Chester, and Montgomery counties
SW Zone	Allegheny, Armstrong, Beaver, Butler, Fayette, Greene, Lawrence, Washington, and Westmoreland counties	Bedford, Blair, Cambria, Indiana, and Somerset counties
LC Zone	Adams, Berks, Cumberland, Lancaster, Lehigh, Northampton, and York counties	Dauphin, Franklin, Fulton, Huntingdon, Lebanon, and Perry counties
NE Zone	Bradford, Centre, Clinton, Lackawanna, Luzerne, Lycoming, Monroe, Pike, Sullivan, Susquehanna, Tioga, Wayne, and Wyoming counties	Carbon, Columbia, Juniata, Mifflin, Montour, Northumberland, Schuylkill, Snyder, and Union Counties
NW Zone	Crawford, Erie, Forest, Mercer, Vanango, and Warren counties	Cameron, Clarion, Clearfield, Elk, Jefferson, McKean, and Potter counties

#### **RATING REGION/COUNTIES**

In addition to separate rating regions, the HealthChoices program considers the different risk characteristics of the enrolled population by establishing separate rate cells. Members are assigned to prospective rate cells based on their age, gender, category of assistance, and program status code.

Effective January 1, 2019 the Adult Expansion population will collapse from four separate Newly Eligible rate cells varying by age and gender down to the two rate cells varying by age.

To reflect the implementation of the Community HealthChoices (CHC) program effective January 1, 2018 for the Southwest zone and anticipated on January 1, 2019 for the Southeast zone, Mercer excluded individuals expected to move from HealthChoices PH to CHC from this databook. These individuals were identified using Department provided eligibility data.

In addition to the six prospective rate cells, there is a maternity care supplemental payment. One payment is made per live birth delivery (C-section or vaginal), regardless of the number of births. The maternity care payment reflects the risk of the mother's PH claims 90 days prior to the birth event and the birth event. Behavioral Health (BH) services provided to pregnant women will be paid for by the BH managed care organizations (BH-MCOs), as provided by the respective agreements.

Rate cells may change between rate cycles to address data credibility, populations entering or leaving HealthChoices, or meet the needs of HealthChoices as it evolves. The rate cells/supplemental payments for CY 2019 rate setting as of the date of this databook are listed below and are subject to change:

- Under Age 1
- TANF-MAGI Ages 1–20
- TANF-MAGI Ages 21+
- Disabled-BCC Ages 1+
- Newly Eligible Ages 19 to 44
- Newly Eligible Ages 45 to 64
- Maternity Care Supplemental Payment

Services that the PH-MCOs were responsible for in the CY 2016 time period include, but are not limited to, the following:

COVERED SERVICES					
Pharmaceutical	Medical Diagnostic				
Pharmaceutical Non-Drug	Federally Qualified Health Center (FQHC) & Rural Health Clinics (RHC)				
Laboratory	Emergency Room				
Radiology	Dental				
Complete early and periodic screening, diagnosis and treatment Screens	Dental/Oral Surgery				
Vision	Primary Care Providers				
Durable Medical Equipment/Medical Supplies	Specialty Physician				
Hospice	Other Practitioners				
Home Health Care/HIV-AIDS Waiver	Facility Non-Inpatient (includes SPU/ASC)				
Family Planning Services	Other Outpatient				
Family Planning — Pharmaceutical	Inpatient Acute Care				
Therapy	Inpatient — Rehab				
Ambulance/Transportation	Nursing Home				

There are separate agreements between the Department and BH-MCOs for the provision of BH services as well as separate agreements for the CHC MCOs for the provision of long-term services and supports.

This databook focuses on the historical encounter data from the PH-MCOs that have been participating in HealthChoices. Since this is actual data from the HealthChoices PH program, no data are included related to graduate medical education or disproportionate share hospital payments. Furthermore, to the extent that any of the PH-MCOs implemented copayments or benefit limitations based on the Department's policies, a portion of the CY 2016 data may include the effects of these programmatic changes (see exhibit in Section 4).

The encounter data for CY 2016 was submitted through PROMISe<sup>™</sup> by the following PH-MCOs listed by zone below:

SOUTHEAST ZONE
Keystone Family Health Plan (Keystone)
Health Partners Plans, Inc. (Health Partners)
UnitedHealthcare of Pennsylvania, Inc. (United)
Aetna Better Health, Inc. (Aetna)
SOUTHWEST ZONE
UPMC for You, Inc. (UPMC)
Gateway Health Plan, Inc. (Gateway)
UnitedHealthcare of Pennsylvania, Inc. (United)
Aetna Better Health, Inc. (Aetna)
LEHIGH/CAPITAL ZONE
AmeriHealth Caritas Health Plan (AmeriHealth)
Gateway Health Plan, Inc. (Gateway)
UnitedHealthcare of Pennsylvania, Inc. (United)
Aetna Better Health, Inc. (Aetna)
UPMC for You, Inc. (UPMC)
NORTHEAST ZONE
AmeriHealth Caritas Health Plan (AmeriHealth)
Aetna Better Health, Inc. (Aetna)

#### NORTHEAST ZONE

Geisinger Health Plan (Geisinger)

#### NORTHWEST ZONE

AmeriHealth Caritas Health Plan (AmeriHealth)

UPMC for You, Inc. (UPMC)

Gateway Health Plan, Inc. (Gateway)

Aetna Better Health, Inc. (Aetna)

To create this databook, Mercer aggregated the PH-MCOs' submitted encounter data for all HealthChoices zones, by rate cell and category of service (COS). Thus, this databook can be described as a current review of the cumulative experience of the PH-MCOs that served the HealthChoices program in CY 2016.

#### CAVEATS

The user of this databook is cautioned against relying solely on the data contained herein. The Commonwealth and Mercer provide no guarantee, neither written nor implied, that this databook is 100% accurate or error-free. The CY 2016 data presented in this databook was supplied from the Commonwealth's Medicaid Management Information System (MMIS) data warehouse on October 10, 2017. Any resubmissions to MMIS by the PH-MCOs after this date are not reflected in this databook unless otherwise noted.

This document assumes the reader is familiar with the Commonwealth's Medicaid program, Medicaid eligibility rules and actuarial rating techniques. It is intended for the Department and the PH-MCOs and should not be relied upon by other parties. Other readers should seek the advice of actuaries or other qualified professionals competent in the area of actuarial rate projections to understand the technical nature of these data. This document should only be reviewed in its entirety.

### 2 SUMMARIZED CALENDAR YEAR 2016 ENCOUNTER DATA

This section summarizes and provides additional detail for the encounter data utilized and for the accompanying databook exhibits.

#### METHODOLOGY

As part of the encounter data review and validation process, Mercer makes several adjustments in order to get the data ready for use in rate setting. The following is a summary of the data criteria and adjustments applied to the CY 2016 encounter data:

- Data accounts for voids and adjustments.
- Data are limited to CY 2016 incurred claims based on first date of service with runout through September 30, 2017.
- Detail paid amounts are used for professional, outpatient, and dental encounters and header paid amounts are used for inpatient and pharmacy encounters. Encounters are grouped into these categories based on claim type. M and B claim types are categorized as professional; O and C claim types are categorized as outpatient; D claim types are categorized as dental; I,A, and L claim types are categorized as inpatient; and P and Q claim types are categorized as pharmacy.
- Pharmacy encounters are gross of all market share rebates that may be achieved by the PH-MCOs. Mercer accounts for these market share rebates as an adjustment in the rate-setting process.
- Eligibility was attached to the encounter data based on eligibility files received from the Department. Attaching eligibility to the encounter data provided member demographic information, such as rate cell and rating region.

In addition to the bullets above, Mercer summarized the PH-MCOs' expense data for each of the COS that are delineated in the financial reports. In order to align the encounter data to the financial report COS, a service category hierarchy logic was applied to the encounter data based on Appendix A of the Financial Reporting Requirements. Appendix A utilizes several metrics including,

but not limited to: procedure codes, revenue codes, provider type and provider specialty, diagnoses, bill type, to map encounters into COS categories.

A separate logic is developed to identify all maternity events (C-section and vaginal) within the encounter data. This logic utilizes a combination of MS-DRGs, diagnoses and procedure codes to identify the maternity event. Once the events are identified in the data, a 90-day lookback process is used to identify all services for members 90 days prior to the delivery event, which aligns with the terms of the supplemental maternity payment.

Several unit metrics are reported in the encounter data. While encounter units considered in rate setting vary by service and are selected based on quality of reporting and nature of the service provided, a uniform approach was taken for the purposes of this databook. A count of detailed lines is the unit metric for all COS except for Inpatient Acute Care, Inpatient Rehab, and Nursing Home, which are based on covered days reported by the PH-MCOs. Due to the combination of procedures within a COS, there may be a variation in an individual PH-MCO's experience when compared to what is reported in aggregate.

#### EXHIBITS

Utilization per 1,000, unit cost, and per member per month (PMPM) data is summarized separately in the exhibits for each rating region by COS for each rate cell. To calculate the utilization and unit cost metrics displayed within the exhibits, the detailed encounter line counts for all categories of service were used, except for Inpatient Acute Care, Inpatient — Rehab, and Nursing Home COS, which use covered days as reported in PH-MCO PROMISe<sup>™</sup> submitted encounter data. To calculate the utilization per 1,000 and PMPM metrics within the exhibits, member months calculated from Department provided eligibility files were utilized.

Maternity data is summarized separately for the PH-MCOs' C-section and vaginal maternity expense data. Since the maternity care payment is made for live births only, the maternity expense data reflects information for only live outcomes. As a result, non-live expense data will not be included in the development of the maternity care payment, but instead will remain in the monthly capitation rates for the applicable rate cell. Note, while the databook displays the maternity data split between C-section and vaginal, only one aggregate supplemental maternity payment (accounting for both C-section and vaginal deliveries) is developed in the rate-setting process.

The data exhibits are Microsoft Excel spreadsheets and are provided in a set of worksheets for each rating region that array rate cells and COS and show a single metric to compare across services and rate cells. The following exhibits for each zone and rate region combination:

- Utilization per 1,000
- Unit Cost
- PMPM/per member per delivery

The PH-MCOs may find the exhibits and additional information on the internet at the following address: <u>http://www.dhs.pa.gov/provider/healthcaremedicalassistance/managedcareinformation/.</u>

# **3** RATE DEVELOPMENT METHODOLOGY

This section provides a description of the rate setting methodology that Mercer will use for the development of the prospective capitation rates for the HealthChoices program. These rates will be developed following an actuarially sound process consistent with applicable federal regulations and professional standards.

#### BACKGROUND

In the past, Mercer developed capitation rates using the Department's historical FFS data. As the HealthChoices program has matured, the rate-setting process has transitioned from a methodology relying upon fee-for-service (FFS) data to a methodology based upon health plan financial, operational, and submitted encounter data. The financial, operational, and submitted encounter data from the PH-MCOs offer the most recent source of data.

#### METHODOLOGY

To develop prospective rates, Mercer will consider the financial, encounter, and eligibility data that each of the PH-MCOs submit to the Department as part of their current contractual requirements. These sources include data on enrollment, expenditures, unit cost, and utilization. Supplementary data may also be incorporated into the rate-setting process. The sources of this supplementary data may be the Department, the current PH-MCOs, and other sources deemed appropriate by Mercer and the Department. For CY 2019 HealthChoices PH rate setting, the submitted PROMISe<sup>™</sup> encounter data will be the primary data source utilized in rate development.

As data, accuracy and validity are essential components in developing capitation rate ranges that are appropriate for HealthChoices and useable by the Department for rate discussions, the Department and Mercer will analyze the submitted data for reasonableness and reliability. The areas that may be reviewed include, but are not limited to, the following:

- The magnitude of reserve estimates relative to incurred claims.
- The consistency of data.
- Side-by-side comparisons of each PH-MCO's data.
- Comparisons of PH-MCO financials to submitted encounters.

To reflect the risk of and the Commonwealth's expectations for the HealthChoices program in the prospective rating period, Mercer will adjust the data as necessary. These adjustments may be positive or negative, specific to a PH-MCO, or more "global" in nature.

Mercer will use CY 2016 PH-MCO financial data from the HealthChoices program to develop an adjustment to align the encounter base with financials. This adjustment serves to address underreporting/overreporting that may exist within the encounter data as well as apply an incurred claims adjustment.

Adjustments may be made to reflect any programmatic and policy changes to the design of the HealthChoices program that are not reflected in the base data. These adjustments also may be positive, negative, or budget neutral. Please refer to the Programmatic Changes section of this narrative for a review of some of these contemplated programmatic/policy changes.

Mercer will trend the data to the applicable prospective rating period since the submitted encounter data represents historical time periods. No single source will be used to develop the prospective managed care trend rates. The trend sources that will be considered include, but are not limited to:

- PH-MCO submitted encounter data.
- PH-MCOs' financial reports.
- HealthChoices market changes.
- Indices (such as consumer price index).
- Neighboring states (FFS trends, managed care trends).

An additional component of the prospective rates will be an amount that is reasonable for administration and underwriting gain. Mercer will develop this rate component, with input from the Department, by analyzing actual administrative expense reports from each of the current health plans and possibly other data sources.

The rate-setting methodology described above will result in capitation rate ranges for each PH-MCO, region, and rate cell. The Department does recommend that each PH-MCO independently analyze its own projected medical and administrative expense and other premium needs for comparison to the Department's rate offers in the aggregate.

#### RISK MITIGATION ARRANGEMENTS

In addition to the base capitation rates, the Department uses supplemental risk mitigation techniques to better match payment to risk among the PH-MCOs in the HealthChoices program.

These risk mitigation techniques apply to both the Traditional and Adult Expansion populations and include:

- Risk-adjusted rates.
- Home nursing risk sharing.
- High-cost risk pool (HCRP).
- Under Age 1 risk sharing.
- Specialty drug risk mitigation:
  - Hepatitis C and cystic fibrosis specialty drug risk sharing (SDRS).
  - Hepatitis C specialty drug quality risk pool (SDRP).

#### **Risk-Adjusted Rates**

The Department also utilizes risk-adjusted rates in the HealthChoices program using the combined Chronic Illness and Disability Payment System and Medicaid Rx risk-adjustment model (CDPS+Rx) developed at the University of California at San Diego. CDPS+Rx quantifies differences in risk between PH-MCOs using age and gender demographics, along with diagnostic and pharmacy usage history. The CDPS+Rx process determines PH-MCO plan factors that adjust the rates that the Department pays to each PH-MCO. The development of PH-MCO plan factors includes a budget-neutrality step that causes the risk-adjustment process to be budget neutral for the Department.

#### Home Nursing Risk Sharing

Additionally, the Department provides risk sharing for home nursing (HN) services provided to children over the age of one. The current terms of the HN risk-sharing program require the PH-MCOs to be responsible for claims up to a threshold of \$5,000 of incurred qualifying HN services, at which point the Department will then reimburse each PH-MCO for 80% of paid claims that are eligible for coverage in excess of this threshold. There is no limit to the risk sharing. Since the HN risk-sharing program is currently based on a CY accumulation period, Mercer will calculate a premium that represents the Department's risk for the next risk-sharing program year.

#### **High-Cost Risk Pool**

The Department implemented an HCRP in all zones with varying historical effective dates for high-cost recipients over the age of one. The primary objective of the HCRP is to improve the distribution of available funds among the participating PH-MCOs for high-cost recipients. For these recipients, the PH-MCOs are at risk for the first \$80,000 of incurred medical costs and 20% of all incurred medical costs in excess of \$80,000. The HCRP is funded by retaining, from the capitation

rates, 80% of the estimated medical expenses that exceed an annualized threshold of \$80,000 for high-cost recipients. These funds are then redistributed among the participating PH-MCOs, based on each PH-MCO's proportion of reported medical expense (in excess of the threshold) associated with high-cost recipients in the zone.

To help assure that the distribution process is not skewed by provider network pricing differences, the Department may reprice PH-MCO-reported inpatient hospital expenses using the Department's Medicaid FFS fee schedule to determine the percentage each PH-MCO receives of the risk pool. Recognizing that risk for high-cost recipients can shift between PH-MCOs and the related cash flow concerns of the PH-MCOs, the risk pool is designed to distribute the risk pool funds based on recent experience patterns of the PH-MCOs, thereby helping to improve the matching of payment to risk for high-cost recipients. The risk pool is not intended to represent specific risk valuation and the funding level may not match ultimate medical expense in any single time period.

#### **Under Age 1 Risk Sharing**

Effective January 1, 2018, a new Under Age 1 rate cell was created. Given the small population size of the rate cell with volatility in high cost claims and because this population is not subject to risk adjustment, the Department implemented an Under Age 1 risk sharing arrangement to help mitigate risk for the PH-MCOs. For recipients who are in the Under Age 1 rate cell during the contract year, the PH-MCOs are at risk for the first \$25,000 of incurred medical costs and 25% of all incurred medical costs in excess of \$25,000 for the rating period. The Under Age 1 risk sharing is funded by retaining, from the capitation rates, 75% of the estimated medical expenses that exceed an annualized threshold of \$25,000 for high-cost members from the Under Age 1 rate cell.

#### Hepatitis C and Cystic Fibrosis Specialty Drug Risk Sharing

Effective January 1, 2016, the Department implemented a Hepatitis C and cystic fibrosis SDRS arrangement. The Department will determine and share with the PH-MCOs a list of drugs and a price list specific to Hepatitis C or cystic fibrosis to be covered under this arrangement. The price list will reflect pricing net of potential PH-MCO price discounts and net of expected rebate levels. The price list will be utilized in the repricing component of the risk sharing arrangement terms. The Department will reimburse the PH-MCOs 80% of the repriced cost of covered drugs. There is no deductible for this program.

#### Hepatitis C Specialty Drug Quality Risk Pool

In addition to the SDRS, effective January 1, 2016, the Department implemented a Hepatitis C SDRP. The SDRP will be distributed to the PH-MCOs based on the number of credits earned. Credits are earned when a PH-MCO submits notice of a completed Sustained Virological Response (SVR) documenting undetectable Hepatitis C Ribonucleic Acid (RNA) following completion of therapy, and the PH-MCO paid for all covered drugs for the member. In the event that more than one PH-MCO covered the responsibilities of notice of the SVR and payment for covered drugs, the credit is allocated based on the notification of the SVR and on the proportion of repriced drug costs

borne by each PH-MCO. The SDRP will be will be funded by 10% of the covered drug cost included in the capitation rate ranges. There is no deductible for this program.

Additionally, all risk mitigation arrangements are mutually exclusive such that a claim cannot qualify for more than one arrangement (risk adjustment not included.) The terms of each risk mitigation program are subject to change and may vary based on the Department's policies.

# **4** PROGRAMMATIC CHANGES CHART

This exhibit describes the programmatic changes that have previously been considered in the capitation rate range development process. This Programmatic Changes Chart is subject to change as additional information becomes available.

#### PROGRAMMATIC CHANGES CHART

ADJUSTMENT	EFFECTIVE Date	RATE CELL	CATEGORY OF Service
Inpatient Pricing Adjustment – Adjustment to inpatient acute care services to reflect reimbursement levels at least equivalent to FFS reimbursement levels.	07/01/2013	Excludes Newly Eligible Rate Cells	Inpatient Acute Care
FQHC/RHC Payment Adjustment – Adjustment applied to reflect FFS prospective payment system levels for FQHC/RHC services.	01/01/2016	Excludes Newly Eligible Rate Cells	FQHC & RHC
High-Cost Pharmacy Removal – Adjustment to reflect the removal of specific high-cost pharmaceuticals from the historical base data for development under a separate methodology (see High-Cost Pharmacy Add-on).	N/A	Excludes Under Age 1 and Newly Eligible Rate Cells	Pharmaceutical
Shift Nursing Fee Increase – \$5/hr. adjustment for Registered Nurses and Licensed Practical Nurses for pediatric shift nursing.	07/01/2016	Excludes TANF-MAGI Ages 21+ and Newly Eligible Rate Cells	Home Health Care/ HIV-AIDS Waiver
Family Planning – Adjustment to account for changes in the medical assistance (MA) fee schedule increasing fees to 125% of Medicare, for select services.	12/01/2016	Excludes Under Age 1 and Newly Eligible Rate Cells	Family Planning Services

ADJUSTMENT	EFFECTIVE Date	RATE CELL	CATEGORY OF Service
<ul> <li>Population Adjustments Non-CHC:</li> <li>Transitional MA</li> <li>5% Income Disregard</li> <li>Fast Track Enrollment</li> <li>IMD Population Removal</li> </ul>	11/01/2016 11/01/2016 01/01/2016 01/01/2018	All Rate Cells	Total Capitation Rate
High-Cost Pharmacy Add-on – Capitation rate add-on for covering specific high-cost pharmaceuticals in the prospective rating period. Historical costs associated with these specific high-cost pharmaceuticals were removed from the base data (see High-Cost Pharmacy Removal). These PMPMs also include amounts for additional screenings expected from the Hepatitis C Screening Act passed in 2016.	N/A	Excludes Under Age 1 Rate Cell	Total Capitation Rate
Opioid Use Disorder Centers of Excellence – Adjustment for PH costs related to the implementation of new Opioid Use Disorder Centers of Excellence.	10/01/2016	Excludes Under Age 1 Rate Cell	Total Capitation Rate
Patient Centered Medical Homes (PCMH) – Adjustment for establishing recently required PCMH arrangements within the HealthChoices program.	01/01/2017	All Rate Cells	Total Capitation Rate
Appendix 14 (APR/DRG Adjustment) – Adjustment to Medicaid payments for inpatient acute care services.	07/01/2010	All Rate Cells	Total Capitation Rate
Appendix 16 (Enhanced Access Payments) – Adjustment to Medicaid payments for professional services.	01/01/2016	All Rate Cells	Total Capitation Rate
Appendix 16a – Adjustment to Medicaid payments for professional services.	01/01/2016	All Rate Cells	Total Capitation Rate
MCO Assessment – Includes a per diem factor of 1.0111 to account for differences between member months and person counts.	07/01/2016	All Rate Cells	Total Capitation Rate
Health Insurance Providers Fee (HIPF) – Adjustment applied to the final capitation rates to provide funding for PH-MCOs subject to the HIPF.	01/01/2014	All Rate Cells	Total Capitation Rate

**Note:** Due to the current budgetary climate within the Commonwealth, other programmatic changes may be considered in developing the rate ranges.

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