

## APPENDIX B: ESSENTIAL HEALTH BENEFITS (EHB)-BENCHMARK PLAN ACTUARIAL CERTIFICATE TEMPLATE

### Instructions for Completing Appendix B:

Under § 156.111(e)(2), States must submit an actuarial certification as part of the EHB-benchmark selection process affirming that the State's EHB-benchmark plan provides a scope of benefits that is equal to the scope of benefits provided under a typical employer plan as defined at § 156.111(b)(2)(i) (supplemented by the State as necessary to provide coverage within each EHB category at § 156.110(a)).

States must complete all fields of this actuarial certification. CMS will consider any partial or blank fields as incomplete. The actuarial report associated with this certification must be submitted as an attachment. Actuarial reports should be uploaded in a format that prevents further editing after submission. For example, States can scan copies of the Actuarial Report or convert documents into a PDF format to upload.

### SECTION 1: TYPICAL EMPLOYER PLANS DETERMINATION FOR § 156.111(b)(2)(i)

1. In accordance with § 156.111(b)(2)(i), does the State's proposed EHB-benchmark plan provide a scope of benefits that are equal to the scope of benefits provided under a typical employer plan as defined at § 156.111(b)(2)(i) (supplemented by the State as necessary to provide coverage within each EHB category at § 156.110(a))?



Yes



No

2. The State's proposed EHB-benchmark plan must provide a scope of benefits that is equal to the scope of benefits of a typical employer plan in the State. The scope of benefits in a typical employer plan in a State is any scope of benefits that is as or more generous than the scope of benefits in the least generous plan (supplemented by the State as necessary to provide coverage within each EHB category at § 156.110(a)), and as or less generous than the scope of benefits in the most generous plan in the State (supplemented by the State as necessary to provide coverage within each EHB category at § 156.110(a)), among the following the plans at § 156.111(b)(2)(ii)(A) and (B). What plans did the state identify as the least and most generous plans among the plans at § 156.111(b)(2)(ii)(A) and (B)?

Anthem Lumenos HSA-Compatible 5000D/100% and FEHB GEHA

3. Briefly describe the methods, assumptions, and data used to determine that the State's proposed EHB-benchmark plan provides a scope of benefits that are equal to the scope of benefits provided under a typical employer plan (or greater than the scope of benefits provided under a typical employer plan, to the extent any supplementation is required to provide coverage within each EHB category at § 156.111(a)).

The Wakely report from Colorado's benchmark update for plan year 2023 showed that the plan selected for the generosity test at that time -- the Federal Employees Health Benefit GEHA plan, which remains an option for selection for the "ceiling" -- provided a benefit value which was 0.26% greater than the benchmark plan in place prior to 2023, and 0.10% greater than the Anthem Lumenos plan, which was selected for the typicality test for the 2023 update and for the "floor" for the 2027 update. The Lewis & Ellis report from February 2023 analyzed the market-wide impact of requiring coverage in Colorado for certain benefits. This report showed that the claims impact of the benefits that are being proposed to be added to the benchmark is 0.01% - 0.02%. This means that the proposed benchmark plan offers benefit value that is at least 0.08% less generous than the "ceiling". Therefore the proposed benchmark plan for 2027 meets the test of providing benefits that are as or less generous than the most generous typical employer plan, and combined with meeting the test of providing benefits that are as or more generous than the least generous typical employer plan, the benchmark proposal passes the new typicality test. The accompanying actuarial report spells out this comparison in more detail.

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**SECTION 2: CERTIFICATION LANGUAGE**

45 CFR § 156.111(e)(2) requires that a State selecting its EHB-benchmark plan must submit an actuarial certification and an associated actuarial report from an actuary, who is a member of the American Academy of Actuaries, in accordance with generally accepted actuarial principles and methodologies that affirms that the State's EHB-benchmark plan provides a scope of benefits that is equal to the scope of benefits provided under a typical employer plan as defined at § 156.111(b)(2)(ii) (supplemented by the State as necessary to provide coverage within each EHB category at § 156.110(a)).

The analysis described in this document and supported in the actuarial report attached to this document was:

- (i) conducted by a member of the American Academy of Actuaries, and
- (ii) performed in accordance with generally accepted actuarial principles and methods, including complying with all applicable Actuarial Standards of Practice (ASOP).

Name of Actuary Completing Form

Ben Allain, ASA, MAAA

Actuary Signature

**Ben Allain**



Digitally signed by Ben Allain  
Date: 2024.12.05 15:10:22 -07'00'

Date

12/05/2024