2021 Private Health Insurance Premium Application Form

# Submissions

Please direct queries regarding the premium application form to [phi@health.gov.au](mailto:phi@health.gov.au).

Applications should be submitted via **SecureDoc**, a cloud-based APRA owned file transfer system by **3pm, 19 November 2020**.

# Confidentiality and Publication

The submitted premium application forms will be treated as **protected information** as defined by the *Private Health Insurance Act 2007*.

Health intends to publish on its website each insurer’s average premium price change and the industry average premium price change.

Only highly aggregated or non-identifiable information will be made public, such as average premium changes in jurisdictions or by insured groups.

# The Premium Application Form

Section 66-10 of the *Private Health Insurance Act 2007* provides that a private health insurer that proposes to change the premiums charged for a complying health insurance product must apply to the Minister for approval of the change:

1. in the approved form; and
2. at least 60 days before the day on which the insurer proposes the change to take effect.

**A written report and three templates (Template A, Template B and Template C)** are collectively referred to as the premium application fo**rm**. Covering letters will also be considered as part of the premium application form.

The premium application form will be assessed by the Department of Health (Health) and the Australian Prudential Regulation Authority (APRA).

In submitting the premium application form, please note:

* New products which have been introduced between 1 April 2020 and 30 September 2020 should be included.
* All information should be provided as instructed in this document.
* Data should align with information provided to APRA, notably HRF601 and HRF602.
* Pages should be numbered in the written report.
* The premium application form should **not** be submitted in PDF format.
* Only information that is relevant to the health insurance business is required.

Health/APRA will contact insurers to discuss applications that do not comply with the guidelines and requirements set out in this document.

# 2021 Average Premium Increase

The 2021 average premium increase will be calculated from the premium as agreed by the Minister for Health in the 2020 premium round, regardless of whether this premium has been applied or not.

# The Written Report

Applications for premium changes should include all information outlined below.

As a guide, an application which is consistent with the insurer’s pricing philosophy and capital management plan is expected to be no more than 20 pages and no more than 10 pages for the Actuarial opinion.

Questions

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| **Reference** | **Question** | **Guidance** |
| 1 | Insurer name | Provide the name of the insurer as registered with APRA as at the premium application date. |
| 2 | Date(s) of premium change effect | Provide the date(s) on which the premium change(s) are to take effect. It is preferable for insurers to implement a date of effect of 1 April. |
| 3 | Consistency with pricing philosophy | Outline whether the 2021 premium application is consistent with the pricing philosophy.  This should detail products that are currently, or expected to be, **outside** of the pricing philosophy and any remedial action planned over the forecast period.  Insurers are expected to demonstrate whether or not products **and** the fund as a whole are aligned to the pricing philosophy. |
| 4 | Consistency with capital management plan | Outline whether the capital projections outlined in Template B are consistent with the insurer’s capital management plan. This should detail any remedial action planned over the forecast period. |
| 5 | Expected benefit growth | Outline the rate at which benefits are expected to change over the forecast period and the reasons for this expectation.  Insurers should reference underlying claiming patterns, the long-term impact of COVID-19, expected changes in membership and product mix. The long-term impact of COVID-19 could include: impact on mental health claims, contracting rates, general utilisation and membership/product mix. |
| 6 | Pricing | Outline any other drivers that have contributed to the prices applied for. This may include programs, initiatives, strategies or material risks. |
| 7 | Concluding statement | Given the information in questions 5 and 6, provide a concluding statement summarising how the key drivers have resulted in the prices applied for. |
| 8 | Hospital product margins | Insurers are asked to provide actual and forecast margins by product tier for the years commencing 1 April 2019, 1 April 2020, 1 April 2021 and 1 April 2022, based on the proposed price increases. Net margins should include management expenses and risk equalisation. Risk equalisation should include gross deficit and calculated deficit. All relevant allocations should be done on a best endeavours basis.   | Year commencing | 1 April 2019 | | | 1 April 2020 | | | 1 April 2021 | | | 1 April 2022 | | | | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | | Margin3 | Gross1 | Gross2 | Net | Gross1 | Gross2 | Net | Gross1 | Gross2 | Net | Gross1 | Gross2 | Net | | Gold |  |  |  |  |  |  |  |  |  |  |  |  | | Silver Plus |  |  |  |  |  |  |  |  |  |  |  |  | | Silver |  |  |  |  |  |  |  |  |  |  |  |  | | Bronze Plus |  |  |  |  |  |  |  |  |  |  |  |  | | Bronze |  |  |  |  |  |  |  |  |  |  |  |  | | Basic Plus |  |  |  |  |  |  |  |  |  |  |  |  | | Basic |  |  |  |  |  |  |  |  |  |  |  |  |   1 Excluding risk equalisation  2 Including risk equalisation  3 Percentage of premium income, on the same basis as Template B, for hospital products |
| 9 | Consistency with Act and Rules | Provide a declaration that the premium changes are consistent with the *Private Health Insurance Act 2007* and *Private Health Insurance (Prudential Supervision) Act 2015*, and the associated Rules, as at the date submitted. |
| 10 | Actuarial opinion | Provide an opinion (and commentary where relevant) from the Appointed Actuary regarding whether the assumptions and forecasts are reasonable. In particular the Appointed Actuary should specifically comment on the reasonableness of DCL over the forecast period and impact of COVID-19 related initiatives and changes in membership.  The Appointed Actuary may also comment on any matter he/she deems relevant to the premium application process.  Provide a comment on the reasonableness of the conversion factor values provided by the insurer in Template C. |
| 11 | Contact person | Provide the contact details of a primary contact person, and an alternative contact person. This should include:   * name * position title * landline telephone number * mobile phone number * E-mail address. |

# Template A (Products)

* All products should be reported regardless of whether a change in premium is being sought.
* Template A should be completed for all products currently available and all new products expected to commence on or prior to **1 April 2021.**
* All products should reflect the name, excesses, and premiums as they will appear in the PHIS and Fund Rules from **1 April 2021.**
* Ambulance Only policies should be included where they are complying health insurance products, and included in HRF601.
* Information should be provided for all products, even if some products have the same price (i.e. information should be provided for couple policies even if they are priced the same as family policies).
* Do not include Overseas Visitors Health Cover products or Overseas Student Health Cover products.
* Do not create new categories as a substitute for drop down list options – select only options in the drop-down menu.
* Template A “number of policies” and “insured people” should be consistent with HRF601 for the **September 2020** quarter.
* Products listed in all templates should be identified with a unique ‘Product Code’ identifier. This should be the PHIS ID.
* If an insurer plans to terminate products from **1 April 2021**, the 2021 price should be identical to the 2020 price.
* For further assistance in completing template A, direct all queries to [phi@health.gov.au](mailto:phi@health.gov.au), using **“2021 Premium Round”** in the subject line.
* **STATE** (column B), NSW and ACT are now combined. Note the spacing “NSW / ACT”.
* **ANNUAL CO\_PAYMENTS** (column J) will now be entered as a dollar amount or as “no cap”. A dollar amount should report the **maximum** allowable **annual total** co-payment amount (this is an amount separate to ANNUAL EXCESS).
* **PRODUCT COVERAGE** (column F) was previously named **PRODUCT TYPE.**
* **2020 MONTHLY PREMIUM ($)** is the approved 1 April 2020 price, regardless of whether this price has been applied or not. The 2021 average premium increase will be calculated from the base price as agreed by the Minister for Health in the 2020 premium round, regardless of whether this price has been applied or not.
* The age-based discount conversion factor at Column O should be identical to that identified in the 2020 premium round. If the discount did not apply to the product, the factor will be 100 per cent.
* The age-based discount conversion factor at Column P of Template A is only relevant to products where the aged-based discount will be applied.
  + If the discount does not apply to the product, the factor will be 100 per cent.
  + If 100 people are on a product, and 10 people are eligible for a 2 per cent aged-based discount, the difference in monthly income when the discount is applied is 0.2 per cent, therefore, the aged-based discount conversion factor is 99.8 per cent.
* The age-based discount conversion factor at Column Q of Template A will calculate the change in the aged based discount. The figures in Column Q flow through to the insurer average premium change figure in Template C.

Field Descriptions

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| **Field** | **Data Entry Guidelines** | **Example** |
| INSURER | Name of insurer. |  |
| STATE | Select from the drop down list the State/Territory in which the product is available. This should be consistent with the risk equalisation jurisdiction for APRA reporting Each State/Territory should be recorded separately (i.e. if the same product is available in multiple states, record in individual rows. | **Drop down list:**  NSW / ACT  NT QLD  SA TAS  VIC WA |
| PRODUCT CODE PHIS ID | Enter in full the unique product identification code for the product, exactly as generated in the PHIS by privatehealth.gov.au (i.e. do not truncate by omitting insurer identifier component of code). This includes products that are closed, or have zero policies/people. |  |
| PRODUCT NAME as at 1 April 2021 | Enter the product name. If the name is duplicated across products, do not leave any rows blank, but instead enter the identical name for each product. This should be consistent with the information recorded in the PHIS for the product. | Gold Hospital Cover |
| PRODUCT STATUS as at 1 April 2021 | Select from the drop down list whether the product is:   * Open and is a New Product to the market. * Open already Existing product. * Closed – Closing, if the insurer plans to close the product anytime between 1 April 2020 to 31 Mar 2021. * Closed prior to 1 April 2020 – Existing. * Terminating, if planning to terminate the product prior to 1 April 2021 with customers being migrated to alternative products. | **Drop down list:**  Open – New Product  Open – Existing  Closed – Closing  Closed – Existing  Terminating |
| PRODUCT COVERAGE | Select only from the drop down list. | **Drop down list:**  Hospital = Hospital treatment only  General = General treatment only  Combined = Combined Hospital and General Treatment  General Ambulance = AmbulanceOnly |
| HOSPITAL CATEGORY as at 1 April 2021 | Select only from the drop down list. This should be consistent with the information recorded in the PHIS for the product with that particular unique product identification code. Leave blank for general products. | **Drop down list:**  Gold  Silver Plus  Silver  Bronze Plus  Bronze  Basic Plus  Basic |
| INSURED GROUP | Select only from the drop down list.  Enter information for each product subgroup separately even if different insured groups have the same price (e.g. include couples information in a separate row from family’s information even if they have the same prices, if they have different PHIS’s). | **Drop down list:**  ChildrenOnly  Couple  ExtendedFamily  ExtendedSingleParentFamily  Family  Single  SingleParentFamily  3+Adults |
| ANNUAL EXCESS as at 1 April 2021 | Enter the amount of the excess for the product as at 1 April 2021. This is the maximum annual excess for the policy. For example, $500 should be entered if the excess is $250 per admission per person but limited to a maximum of $500 per year. This should be consistent with the information recorded in the PHIS for the product with that particular unique product identification code. | $500 |
| ANNUAL CO-PAYMENT as at 1 April 2021 | Enter the maximum annual total co-payment amount for the product as at 1 April 2021. For example, enter $500 if the co-payment is $50 per admission for every admission up to a maximum of $500 per year. If no cap exists, enter “no cap”. | $500 or “no cap” |
| 2020 MONTHLY PREMIUM ($) | Enter the approved 1 April 2020 price, regardless of whether this price has been applied or not.  Enter the price of all products introduced between 1 April 2020 and 30 September 2020.  This price should reflect the full price and exclude the rebate, LHC loadings, and discounts.  For new products commencing on 1 April 2021, please leave blank. | $100.07 |
| 2021 MONTHLY PREMIUM ($) as at 1 April 2021 - for all products (new and existing) | Enter the proposed new price per month for the product as at 1 April 2021, including for new products. This price should reflect the full price and exclude the rebate, LHC loadings, and discounts.  For products terminating by 1 April 2021, please enter the 2020 price. | $101.67 |
| TOTAL NUMBER OF PEOPLE COVERED BY THIS PRODUCT as at 30 September 2020 | Enter the total number of people covered by the policies comprising the insured group for the particular product as at 30 September 2020 (e.g. number of people covered by family policies for the product). Do not record SEUs.  Please leave blank for new products commencing on 1 April 2021. | 2,000 |
| TOTAL NUMBER OF POLICIES COVERED BY THIS PRODUCT as at 30 September 2020 | Enter the total number of policies comprising the insured group for the particular product as at 30 September 2020 (e.g. number of couple’s policies for the product). Do not record SEUs.  Please leave blank for new products commencing on 1 April 2021. | 1,000 |
| AVERAGE AGE-BASED DISCOUNT CONVERSION FACTOR 2020 | The average aged-based discount conversion factor applied in the 2020 premium round should be applied. 100% should be applied to products that did not have an age-based discount in 2020. |  |
| AVERAGE AGE-BASED DISCOUNT CONVERSION FACTOR 2021 | The average aged-based discount conversion factor applied to all policies on this product. 100% should be applied to products that do not have age-based discounts or for all new products. |  |
| AVERAGE AGE-BASED DISCOUNT CONVERSION FACTOR NET | This is an automated field that calculates the 2020 aged-based factor less the 2021 aged-based factor. This provides a net factor for 2021 calculations. |  |
| MONTHLY INCOME FROM PRODUCT | This is an automated field that calculates the 2020 monthly income from all policies on the product based on 2020 monthly premium in column K multiplied by the total number of policies covered by this product as at 30 September 2020 in column N. Because there will be zero policies in column N for a proposed new product, this field will be zero for all new products. |  |
| 2021 PREMIUM INCREASE ($) | This is an automated field that calculates the dollar value of the premium change between the 2021 monthly premium price and the 2020 premium price. For new products this field will be automatically flagged as a ‘new’ product. For terminating products this field will be automatically flagged a “terminating”. |  |
| 2021 PREMIUM INCREASE (%) | This is an automated field that calculates the percentage change of the premium change between the 2021 monthly premium price and the 2020 premium price. For new products this field will be automatically flagged as a ‘new’ product. For terminating products this field will be automatically flagged a “terminating”. |  |
| 2021 MONTHLY INCOME FROM PRODUCT | This is an automated field that calculates the 2021 monthly income for all policies on the product based on the 2021 monthly premium multiplied by the total number of policies covered by this product as at 30 September 2020. Because there will be zero policies for a proposed new product, this field will be zero for all new products. |  |

# Template B (Financials)

* Information requested in dollars should be entered as thousands of dollars ($’000).
* Forecasts are required for the period October 2020 to March 2023.
* Figures under the Balance sheet and Capital Adequacy Standard for September 2020 should align with the September 2019 HRF602 returns.
* Hospital SEUs at September 2020 should reconcile with the HRF601 and HRF602.
* Expected dividend payments should be entered as a positive value and capital injections expected to be received as a negative value under ‘dividend payments’.
* Capital Target Range should be expressed as total assets. This is the amount of assets required to be consistent with the targets outlined in the Capital Management Plan. Capital target range upper and lower bounds should both be entered. Where only a single target exists, this is to be repeated.
* **Change in DCL due to deferred treatments occurring – dollar amount** (row 44) –This is the central estimate of costs of services performed within the month arising from procedure deferrals[[1]](#footnote-1). A negative amount reflects a reduction in the DCL
* **Change in DCL due to associated risk margin – dollar amount** (row 45) – This will capture the change in DCL due to changes in risk margins. A negative amount reflects a reduction in the DCL.
* **Other changes in DCL – dollar amount** (row 46 – formula driven) – This reflects other changes to the DCL not explained by rows 44 and 45. This would include any additional procedures deferred. A negative amount reflects a reduction in the DCL. A positive amount reflects an increase in the DCL. Non-zero amounts should be explained in the written report.
* **Deferred Claims Liability** (row 60). To be calculated as per APRA’s letter 1.
* Method for calculating **Other liabilities amount (including deferred claims liability)** (row 81) is unchanged, and per APRA returns.
* **Deferred claims liability (valued at 98th percentile)** (row 82) - This item has been added to express the DCL included within the above item.
* Note: risk equalisation should be included in rows 44 and 45. The inclusion of claims handling in the DCL is at the discretion of the insurer. If claims handling is in the DCL then claims handling should also be in rows 44 and 45.

# Template C (Snapshot)

* Insurers are only required to complete the white cells. Grey cells will automatically calculate.
* Rate Protection Conversion Factor (%) will convert Excluding Rate Protection (%) into Including Rate Protection (%). To be calculated as per prior years.
* Proposed changes to benefits, should include an estimated cost or saving as a percentage of total contribution income. Savings should be stated as a negative amount as a percentage of Total Contribution Income.

# Avoiding Data Issues and Resubmissions

Each year a number of insurers are asked to resubmit applications due to incorrectly completing the approved form or for data issues. To avoid these in the coming round, insurers are asked to be particularly vigilant of data issues that have historically resulted in insurers being asked to resubmit.

To ensure each application does not contain data issues it is requested insurers check the following before submitting:

* No additional columns or rows are inserted into **Template B.**
* The excel spreadsheet does not contain links to other files.
* The capital target range is expressed as total assets, not net assets (capital).
* Cells surrounding the template are blank. Cells outside of the requested fields do not have checking or verification calculations.
* Changes to benefits in **Template C** that result in savings are expressed as a negative.
* Cells requesting a number have a number inserted and not text. Similarly that cells with a number have not been formatted to ‘text’.
* Cells in **Template B** without a value have a ‘0’ inserted and are not left blank.
* If an insurer has a single capital target rather than a range, this figure is entered into both the lower and upper bound.
* The formula cells have not been edited by the insurer.
* Data entered by the insurer should be values and not include calculations.
* Expected dividend payments should be entered as a positive value and capital injections expected to be received as a negative value under ‘dividend payments’.

1. Restrictions on medical services introduced in March 2020 in response to COVID-19 have affected the pattern of claims by private health insurance policyholders. As some treatments were unable to proceed, insurers will typically have experienced a fall in benefit expenditure in the June quarter. However, in many instances policyholders affected by the restrictions will defer rather than forgo treatment, resulting in a delay in when they claim benefits from their health insurance policy. These claims that are deemed to have been deferred are referred to as the "deferred claims". Refer to APRA's ["Application of the capital framework for COVID-19 related disruptions" letter](https://www.apra.gov.au/application-of-capital-framework-for-covid-19-related-disruptions) dated 22 June 2020 for a discussion on the DCL and deferred claims. [↑](#footnote-ref-1)