

State: TexasFiling Company: CHRISTUS Health Plan

TOI/Sub-TOI: HOrg02I Individual Health Organizations - Health Maintenance (HMO)/HOrg02I.005D Individual - HMO

Product Name: CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing

Project Name/Number: CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing/CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing

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User Usage Agreement Attachments

Usage Agreement

[Usage Agreement.pdf](#)

Supporting Document Attachments

(ex. Supporting Document Name Attachment Name)

HMO Transmittal Checklist and Certification Form

[CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing_HMO_Transmittal_Form.pdf](#)

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Filing at a Glance

Company:	CHRISTUS Health Plan
Product Name:	CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing
State:	Texas
TOI:	HOrg02I Individual Health Organizations - Health Maintenance (HMO)
Sub-TOI:	HOrg02I.005D Individual - HMO
Filing Type:	Rate
Date Submitted:	06/12/2025
SERFF Tr Num:	CHHP-134512532
SERFF Status:	Pending Industry Response
State Tr Num:	CHHP-134512532
State Status:	RA-REFERRED TO ACTUARY
Co Tr Num:	CHRISTUS_HEALTH_PLAN_TEXAS_HEALTH_EXCHANGE_RATE_FILING
Effective	01/01/2026
Date Requested:	
Author(s):	Vae Barnett, Ben Hartmann, Craig Hicks, Chindanu Ozuah, Kaylan Pickett
Reviewer(s):	Hector Garza (primary), Dewayne Matthews, R. Michael Markham, Bing Wu, Chonlada Pongpipattanachai
Disposition Date:	
Disposition Status:	
Effective Date:	

State: Texas **Filing Company:** CHRISTUS Health Plan
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General Information

Project Name: CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing
 Status of Filing in Domicile: Pending

Project Number: CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing
 Date Approved in Domicile:

Requested Filing Mode: Review & Approval
 Domicile Status Comments: Texas is the state of domicile for the Company.

Explanation for Combination/Other: Market Type: Individual
 Submission Type: New Submission
 Individual Market Type: Individual
 Overall Rate Impact: Filing Status Changed: 08/08/2025
 State Status Changed: 06/13/2025

Deemer Date: 08/12/2025
 Created By: Craig Hicks
 Submitted By: Craig Hicks
 Corresponding Filing Tracking Number:
 State TOI: TXL.AH.11 AH - HMO

State Sub-TOI: TXL.AH.11 AH - HMO
 PPACA: Non-Grandfathered Immed Mkt Reforms

PPACA Notes: null

Exchange Intentions: CHRISTUS Health Plan intends to market the product on the Exchange beginning 01/01/2026.

Filing Description:
 CHRISTUS Health Plan Texas Health Exchange Rate Filing
 Filing Description:
 CHRISTUS Health Plan
 Rate/Rule Schedule

Company Identifying Information:
 Company Legal Name: CHRISTUS Health Plan
 State: The State of Texas has regulatory authority over these policies.
 HIOS Issuer ID: 66252
 NAIC #: 14154
 Market: Individual
 Effective Date: January 1, 2026

Sincerely,

Craig Hicks
 Coordinator of Health Plan Regulatory Filing
 CHRISTUS Health Plan
 5101 N. O'Connor Blvd. | Irving | TX 75039
 (o) 469-282-3089 |
 www.christushealth.org

State: TexasFiling Company: CHRISTUS Health Plan

TOI/Sub-TOI: HOrg02I Individual Health Organizations - Health Maintenance (HMO)/HOrg02I.005D Individual - HMO

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Company and Contact

Filing Contact Information

Craig Hicks, Coordinator of Health Plan Regulatory Filing

craig.lloydhicksjr@christushealth.org

5101 N. OConnor Blvd.

469-282-3089 [Phone] 23089 [Ext]

Irving, TX 75039

Filing Company Information

CHRISTUS Health Plan

5101 N. O'Connor Blvd.

Irving, TX 75039

(469) 282-2256 ext. [Phone]

CoCode: 14154

Group Code: 4958

Group Name: Christus Hlth Grp

FEIN Number: 45-2106295

State of Domicile: Texas

Company Type:

State ID Number:

State: Texas **Filing Company:** CHRISTUS Health Plan
TOI/Sub-TOI: HOrg02I Individual Health Organizations - Health Maintenance (HMO)/HOrg02I.005D Individual - HMO
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Filing Fees

State Fees

Fee Required? Yes
Fee Amount: \$100.00
Retaliatory? No
Fee Explanation:
Per Company: No

Company	Amount	Date Processed	Transaction #
CHRISTUS Health Plan	\$100.00	06/12/2025 12:40 PM	318377985

EFT Total **\$100.00**

State Specific

1. Is this a Consumer Choice Plan? Yes, No, or N/A: Yes
2. Is this filing submitted simultaneously with another filing? Yes or No. If so, attach a list under Supporting Documentation.: No
3. Will the form(s) in this submission be used with previously approved, exempted, forms or rates? Yes or No. If yes, attach a list under Supporting Documentation.: No
4. Was this submission previously disapproved, withdrawn, or rejected? If yes, update Corresponding Filing Tracking Number field.: No
5. Is this filing related to the COVID-19 pandemic? Yes or No: No
6. If submitting a life insurance policy, will the policy be illustrated? Yes or No or N/A: N/A
7. Will the filed forms be used in the prepaid funeral market? Yes, No, or N/A.: N/A

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Correspondence Summary

Amendments

Schedule	Schedule Item Name	Created By	Created On	Date Submitted
Rate	2026_CCHB_Certification_for_TDI_CHP_Indiv	Craig Hicks	07/16/2025	07/16/2025
Rate	PY2026_Rates_Template_CHP_TX_2025_06_11_RV	Craig Hicks	07/16/2025	07/16/2025
Rate	CY2026_CHP_TX_Individual_AVC_Screenshots	Craig Hicks	07/16/2025	07/16/2025
Supporting Document	Actuarial Memorandum	Craig Hicks	07/16/2025	07/16/2025
Supporting Document	AV Cost Sharing Design Template	Craig Hicks	07/16/2025	07/16/2025
Supporting Document	Enrollment Template FY2024	Craig Hicks	07/16/2025	07/16/2025
Supporting Document	Unified Rate Review Template	Craig Hicks	07/16/2025	07/16/2025
Supporting Document	PY2026_Rates_Template_TX_2025_07_15_RV	Craig Hicks	07/16/2025	07/16/2025
Supporting Document	Memo_Summary_of_Updates_in_TX_Rate_Filing_2025_07_15	Craig Hicks	07/16/2025	07/16/2025
URRT	Unified Rate Review Template	Craig Hicks	07/16/2025	07/16/2025
URRT	Actuarial Memorandum	Craig Hicks	07/16/2025	07/16/2025
URRT	Actuarial Memorandum - Redacted	Craig Hicks	07/16/2025	07/16/2025

State: Texas **Filing Company:** CHRISTUS Health Plan
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Response Letter

Response Letter Status	Submitted to State
Response Letter Date	08/11/2025
Submitted Date	08/11/2025

Dear Hector Garza,

Introduction:

Thank you for your review.

Response 1

Comments:

After analyzing the enrollment template and the members that were outside of our service area, we found that 0.9% (537) members were in counties that have split counties based on the members zip code. There are another 0.05% (27) members that we are still investigating to confirm the detail. We would like to discuss the details and the reconciliation of these members tomorrow when we meet on the rates.

Related Objection 1

Comments: In the Availability tab of the Enrollment Template, there are 38 counties where plans are offered. In the Enrollment tab, 63 counties have enrollment. For example, Duval county shows 290 enrollees when the Availability tab shows no availability. Please explain the discrepancy.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No URRT Items Changed.

No Supporting Documents changed.

Conclusion:

Sincerely,
Craig Hicks

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Response Letter

Response Letter Status	Submitted to State
Response Letter Date	07/22/2025
Submitted Date	07/22/2025

Dear Hector Garza,

Introduction:

Thank you for reviewing my application.

Response 1

Comments:

#1a Response: CHRISTUS updated the minimum % change and maximum % change in SERFF. These values were based on the PY26 premiums assuming April 2025 members would stay in their current plan. Please see Table 2.3 in the Actuarial Memorandum.

#1b Response: Current members are assumed to stay in the same benefit plan but get a new HIOS ID as explained below and illustrated in Table 2.3 of the Actuarial Memorandum.

CHRISTUS Health Plan (CHP) established PY25 HIOS IDs such that the HIOS Product ID differentiated benefit plans, while the PY25 HIOS Plan ID was used to differentiate benefit plans in each rating area. This approach resulted in ten PY25 HIOS Plan IDs across ten rating areas for the same benefit plan and has contributed to additional complexity in plan management.

To address this issue, for PY26 we have created a new HIOS Plan ID per benefit plan that is the same across the ten rating areas, resulting in far less HIOS plan IDs for CHP to manage. The PY26 HIOS Plan IDs are now directly associated with the benefit plan itself and are no longer related to the rating area. This change is intended to simplify plan administration and ensure alignment with how other carriers manage their HIOS IDs for individual plans.

Since the benefit plans are the same in PY25 and PY26, the only change from members perspective is getting a new PY26 HIOS IDs. This approach was taken to ensure continuity of coverage and minimize disruption for members.

#1c Response: Please see Table 2.3 of the Actuarial Memorandum. As explained above, members are staying in the same benefit plan while getting a new HIOS ID. CHRISTUS Health Plan submitted HIOS ID crosswalk file to ensure smooth renewing process of members. Therefore, we believe the mappings are appropriate and realistic.

#1d Response: Terminating members were identified in counties where 2025 plans will not offered in 2026. These members were assumed to migrate to the lowest cost plan for the same metal level.

#2 Response: Thank you for your detailed feedback and for referencing 28 TAC, Part 1, Chapter 3, Subchapter F, Rule 3.505(f), as well as 45 CFR §156.140. We have updated our methodology to ensure that the actuarial values (AVs) reported in URRT Worksheet 2, Line 3.3, and in Column E of the AV and Cost Sharing Design Template (AVCSDT) are consistent with the AVs used in pricing. Revised versions of the URRT, AVCSDT, Rates Template, and Actuarial Memorandum have been provided.

All Pricing AVs now fall within the de minimis variation permitted for the applicable level of coverage. We confirm that the values in Column E of the AVCSDT and Worksheet 2, Line 3.3 of the URRT align. Therefore, no additional AVCS adjustment factors were accounted for separately from the Pricing AV.

Related Objection 1

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Comments: 1. Since CHRISTUS is terminating all plans and introducing 23 new plans, please provide responses to the following:

- a) Where are the Minimum % Change and Maximum % Change entered in SERFF from?
- b) How did the company determine the mappings and membership allocation from the terminating plans to the new plans?
- c) How are the mappings are appropriate and realistic?
- d) How did the company identify or determine terminating members?

2. Per 28 TAC, Part 1, Chapter 3, Subchapter F, Rule 3.505(f):

"the AV used in the pricing of the plan, which must fall within the de minimis variation permitted for the level of coverage provided by the plan under 45 CFR §156.140"

Please complete the AV and Cost Sharing Design Template to comply with TDI regulations and revise Worksheet 2, Line 3.3 of the URRT accordingly. Note that the values in Column E of the AVCSDT and Worksheet 2, Line 3.3 of the URRT should align. Any adjustment factor(s) should be accounted for separately from the Pricing AV and detailed in the actuarial memorandum, including the derivation and source(s) of the factor(s).

Currently, the Plan IDs below are out of compliance in the AVCSDT:

66252TX0380002
 66252TX0380005
 66252TX0380003
 66252TX0380006
 66252TX0380010
 66252TX0380012
 66252TX0380014
 66252TX0380016
 66252TX0380001
 66252TX0380008
 66252TX0380013
 66252TX0410008
 66252TX0410010
 66252TX0410012

Failure to comply with the regulation will lead to the rates being disapproved.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No URRT Items Changed.

No Supporting Documents changed.

State: TexasFiling Company: CHRISTUS Health Plan

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Conclusion:

Sincerely,
Craig Hicks

State:	Texas	Filing Company:	CHRISTUS Health Plan
TOI/Sub-TOI:	HOrg02I Individual Health Organizations - Health Maintenance (HMO)/HOrg02I.005D Individual - HMO		
Product Name:	CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing		
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Response Letter

Response Letter Status	Submitted to State
Response Letter Date	07/17/2025
Submitted Date	07/17/2025

Dear Hector Garza,

Introduction:

Thank you for reviewing my application.

Response 1

Comments:

1. Response: We confirm that the Projected Earned Premium, Projected Incurred Claims, and Weighted Avg. PMPM on the Rate/Rule Schedule tab will be revised to align with the corresponding figures reported in Worksheet 2, Section IV of the URRT.

2.Response: We reviewed the guidance in 45 CFR 156.140. We would like to point out that following the Marketplace Integrity and Affordability Final Rule (MIAR) published on June 25, 2025 (90 FR 27223), the permitted de minimis variation ranges for actuarial values have been expanded. As a result of this amendment, all of the plans referenced in your objection are now within the updated de minimis ranges as specified by the revised regulation.

Our understanding is that the metal AV value needs to comply with 45 CFR 156.140 and the MIAR. The AVCSDT doesnt show the metal AV values in this template. Instead, you may find the URRT metal AV in row 15 (item 1.6). Please see the AV screenshots attached that shows all plans are successfully passing the AVC testing.

In addition, the Plans and Benefits Template (PBT) also tested the compliance of actuarial values before finalization. As shown in the 2026 PBT, all plans are within the allowed de minimis ranges.

Therefore, we believe no further revisions to the AVCSDT or URRT are necessary at this time.

Related Objection 1

State: Texas **Filing Company:** CHRISTUS Health Plan
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Comments: 1. In the Rate Review Detail area of the Rate/Rule Schedule tab, the Projected Earned Premium, Projected Incurred Claims, and Weighted Avg. PMPM do not match what was entered in Worksheet 2, Section IV of the URRT. Please revise the figures for consistency.

2. In the AV Cost Sharing Design Template (AVCSDT), the 14 Plan IDs below have Pricing Actuarial Values that are not within the de minimis variation permitted for the level of coverage provided by the plan under 45 CFR 156.140. Please revise the AVCSDT and URRT so that the plans comply with the regulation. Note that the values in Column E of the AVCSDT and Worksheet 2, Line 3.3 of the URRT should align.

66252TX0380002
66252TX0380005
66252TX0380003
66252TX0380006
66252TX0380010
66252TX0380012
66252TX0380014
66252TX0380016
66252TX0380001
66252TX0380008
66252TX0380013
66252TX0410008
66252TX0410010
66252TX0410012

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No URRT Items Changed.

No Supporting Documents changed.

Conclusion:

Sincerely,
Craig Hicks

State:

Texas

Filing Company:

CHRISTUS Health Plan

TOI/Sub-TOI:

HOrg02I Individual Health Organizations - Health Maintenance (HMO)/HOrg02I.005D Individual - HMO

Product Name:

CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing

Project Name/Number:

CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing/CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing

Amendment Letter

Submitted Date: 07/16/2025

Comments:

Please be advised that CHRISTUS Health Plan has submitted final rates after the Marketplace Integrity and Affordability Rule (MIAR) Final Rule.

Changed Items:

No Form Schedule Items Changed.

No Rate Schedule Items Changed.

URRT Schedule Item Changes	
Item Name	Attachment(s)
Actuarial Memorandum - Redacted	CY2026_CHP_TX_Indiv_Act_Memo_Redacted.pdf

No Supporting Documents Changed.

SERFF Tracking #:	CHHP-134512532	State Tracking #:	CHHP-134512532	Company Tracking #:	CHRISTUS_HEALTH_PLAN_TEXAS_HEA LTH_EXCHAN...
State:	Texas	Filing Company:	CHRISTUS Health Plan		
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Project Name/Number:	CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing/CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing				

URRT

State Determination

Review Status:	Incomplete
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SERFF Tracking #:	CHHP-134512532	State Tracking #:	CHHP-134512532	Company Tracking #:	CHRISTUS_HEALTH_PLAN_TEXAS_HEA LTH_EXCHAN...
State:	Texas		Filing Company:	CHRISTUS Health Plan	
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URRT Items

Item Name	Attachment(s)
Actuarial Memorandum - Redacted	CY2026_CHP_TX_Indiv_Act_Memo_Redacted.pdf
Consumer Justification Narrative	
Other Supporting Documents	

State:

Texas

Filing Company:

CHRISTUS Health Plan

TOI/Sub-TOI:

HOrg02I Individual Health Organizations - Health Maintenance (HMO)/HOrg02I.005D Individual - HMO

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CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing

Project Name/Number:

CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing/CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing

Supporting Document Schedules

Satisfied - Item:	HMO Transmittal Checklist and Certification Form
Comments:	HMO Trans
Attachment(s):	CHRISTUS_Health_Plan_Texas_Health_Exchange_Rate_Filing_HMO_Transmittal_Form.pdf
Item Status:	
Status Date:	