

The Effects of Price Regulation in Markets with Strategic Entry: Evidence from Health Insurance Markets

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Introduction

- ▶ Price regulation
 - Pharmaceuticals
 - Interest rate limits
 - Housing markets
 - Health insurance
- ▶ Entry responses interfere
- ▶ Hard to distinguish entry decisions resulting from:
 - price regulation
 - market characteristics

Introduction

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 - market characteristics

Key Question: How does strategic entry interact with price regulation?

Setting: Community Rating in Health Insurance

- ▶ *Community rating*: insurance priced on location not health status
- ▶ US individual market: pricing restrictions at the rating area level (group of counties)
- ▶ Entry decisions at the county level
 - Partial entry: enter some but not all counties in rating area

Trade-offs in Rating Area Design

When a regulator adds a county to a rating area:

- ▶ Size of the market increases
 - Economies of scale → more entry, ↓ prices
- ▶ Composition of the market changes
 - If different costs, pricing rules can lead to partial entry → less entry, ↑↓ prices
 - Fang and Ko (2024)
 - Changes in market composition affect prices → different prices
- ▶ Two goals: competition and pooling consumers with different costs

- ① Shows community rating design affects entry and prices
 - Counties near state borders are in smaller rating areas with different market outcomes
 - Structural model of firm entry and pricing decisions in the state of Oregon

- ① Shows community rating design affects entry and prices
- ② Evaluates whether entry and price regulations should be aligned geographically
 - Policy Proposal #1: **Ban partial entry**
 - Net **positive entry**
 - Marginal firms charge **higher prices**

This Paper

- ① Shows community rating design affects entry and prices
- ② Evaluates whether entry and price regulations should be aligned geographically
- ③ Quantifies trade offs of expanding rating areas with partial entry
 - Policy Proposal #2: **Increase rating area size**
 - Increased competition
 - Less price variation
 - Heterogeneity → Selective non-entry
 - Regulators must balance two goals

Outline

- 1 Introduction
- 2 Institutional Details and Data
- 3 Motivating Evidence
- 4 Model
- 5 Alternative Regulations
- 6 Conclusion

Individual Health Insurance Exchanges

① Price regulations

- Firms set base price for rating area (groups of counties)
- Age, smoking adjustments regulated
- Consumers subsidized by federal government

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- Entry decisions at county level
- Guaranteed issue
- Must meet network adequacy standards

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- Must meet network adequacy standards

③ States as regulators

- Define rating areas
- May add additional regulations

Colorado Rating Area Change

Texas Rating Area Change

① National Market

- Qualified Health Plans (QHP) Public Use Files: entry decisions, plan characteristics
- CMS Open Enrollment data: enrollment
- American Community Survey (ACS) + Area Health Resource Files (AHRF): demographics, health info

② Oregon

- All of the above plus:
- Plan enrollment + off exchange enrollment from insurance regulator
- Small Area Health Insurance Estimates
- All Payer All Claims cost data

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State Lines Constrain Rating Areas

- ▶ Challenge: rating areas not drawn at random
- ▶ Solution: use that rating areas **cannot cross state lines**

$$Y_{ist} = \alpha_s + \tau_t + \beta_1 \cdot \text{Rural}_i + \beta_2 \cdot \text{Distance}_i + \beta_3 \cdot \text{CrossState}_i + \gamma \cdot X_{it} + \epsilon_{ist}$$

- ▶ where:
 - Y_{ist} : rating area size, entry, prices
 - α_s : state fixed effects
 - τ_t : year fixed effects
 - Rural_i : indicator for being rural
 - Distance_i : distance to the nearest metropolitan area
 - CrossState_i : indicator for being across a state line from the metropolitan area

Constrained Rating Areas Have Different Market Outcomes

| | (1) | (2) | (3) | (4) |
|---------------|----------------------|-----------------------|------------------------|------------------------|
| | RA Size | # Insurers | Missing Insurer? | Log(Price) |
| Cross State=1 | -12.22*** (3.223) | -0.254*** (0.0372) | -0.0505*** (0.0166) | 0.0386*** (0.00649) |
| N | 8211 | 8211 | 8211 | 8211 |
| Outcome Mean | 97.52 | 2.546 | 0.361 | 8.166 |
| R2 | 0.719 | 0.607 | 0.372 | 0.756 |

Standard errors in parentheses

* $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$

- ▶ Counties whose rating area is constrained are in **smaller rating areas**
- ▶ They have **less competition**, **fewer missing insurers**, and **higher prices**

Outline

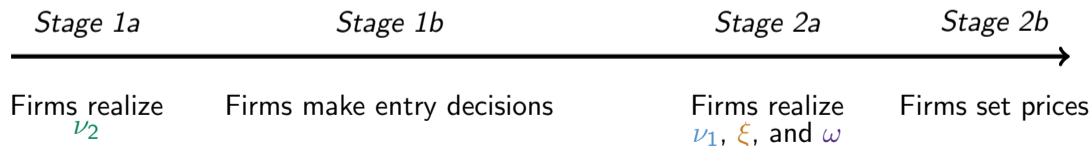
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Model Set Up

- ▶ Players: Insurers that enter anywhere in Oregon
- ▶ Actions:
 - Entry
 - Pricing
- ▶ Uncertainty:
 - Fixed costs (ν_1, ν_2)
 - Demand (ξ)
 - Marginal costs (ω)

Model Set Up

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- ▶ Timing:




Expected Profits

Insurer n 's expected profits Π_{nbr} from entering bundle b of counties in area r are given by:

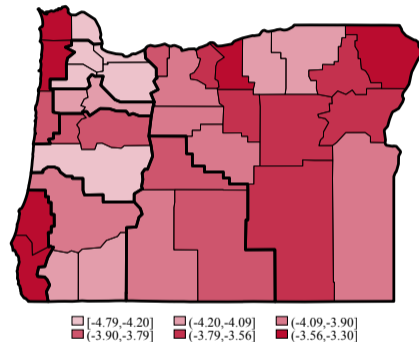
$$\Pi_{nbr} = \underbrace{\sum_{m \in b} D_{nm}(p_{nb}; \theta) \cdot (p_{nb} - c_{nm})}_{VP_{nr}(b; \theta, c_{nm})} - F_{nbr}$$

- ▶ $D_{nm}(p_{nb}; \theta)$: demand for insurer n 's three insurance products in market m
- ▶ p_{nb} : prices for those products in bundle of counties b
- ▶ c_{nm} : marginal costs of providing insurance
- ▶ F_{nbr} : fixed cost of entering bundle b of counties in rating area r

- ▶ Consumer utility from: 
 - Plan characteristics
 - Price (age, income specific)
- ▶ Outside option: being uninsured
- ▶ Estimate using BLP with micro moments:
 - Outside option market shares by demographic groups
 - Silver share for consumers eligible for cost subsidies
- ▶ Price endogeneity: regulatory features of subsidies

Demand Estimates

- ▶ Price sensitivity highest for low income consumers >
- ▶ Low income consumers value silver plans extra >



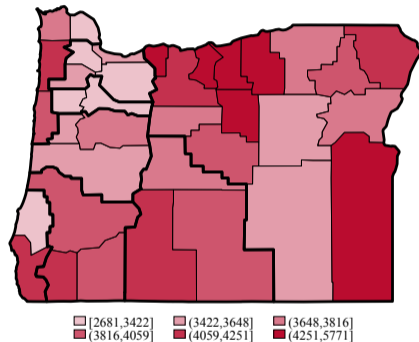
Average Silver Plan Elasticity

Marginal Cost Estimation

- ▶ Invert first order conditions to get bundle-level costs >
- ▶ Project onto characteristics to get cost parameters >
- ▶ Estimate county level costs from these parameters

Marginal Cost Estimates

- ▶ Costs are higher in less dense areas >
- ▶ Costs are higher in non-entered counties >



Silver Level Marginal Costs

Fixed Costs

- ▶ Two components of fixed costs: rating area specific and county specific

$$F_{nbrt} = F_R + \sum_{m \in b} F_{nmt}$$

- ▶ F_R : regulatory and marketing costs

Fixed Costs

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- ▶ F_R : regulatory and marketing costs
- ▶ F_{nmt} : costs of network set up for county m
 - Function of county characteristics and insurer characteristics

Fixed Costs

- ▶ Two components of fixed costs: **rating area** specific and **county** specific

$$F_{nbrt} = F_R + \sum_{m \in b} F_{nmt}$$

- ▶ F_R : regulatory and marketing costs
- ▶ F_{nmt} : costs of network set up for county m
 - Function of county characteristics and insurer characteristics
- ▶ Estimation by moment inequalities
 - Revealed preference approach 
 - Create unconditional inequalities (Eizenberg 2014) to handle selection on error term
 - Estimates of entering an entire rating area largely between **\$1-5 million**

Model Validation

| Outcome | Observed | Model |
|---------------------------|----------|---------|
| Number of Firms | 2.47 | . |
| # Markets Unserved | 0 | . |
| Avg. Silver Price | 4740.23 | 4694.69 |
| Std Dev Avg. Silver Price | 384.54 | 174.74 |
| Avg. Enrollment | 30.31% | 30.63% |
| Avg. CS (\$) | . | 472.73 |

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Eliminating Partial Entry Increases Entry

| Outcome | Observed | Model | No Partial Entry | County RAs |
|---------------------------|----------|---------|------------------|------------|
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When partial entry is banned:

- ▶ **More firms enter** partially non-entered counties than exit partially entered

Skip

Maps

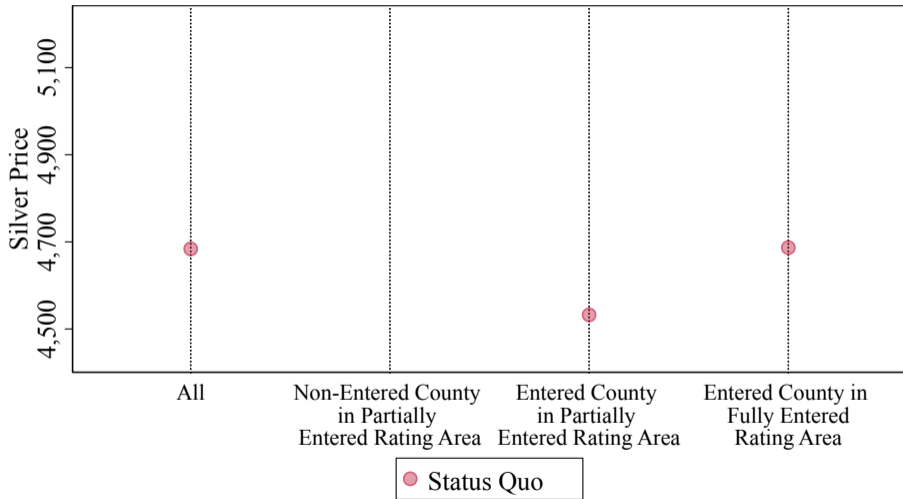
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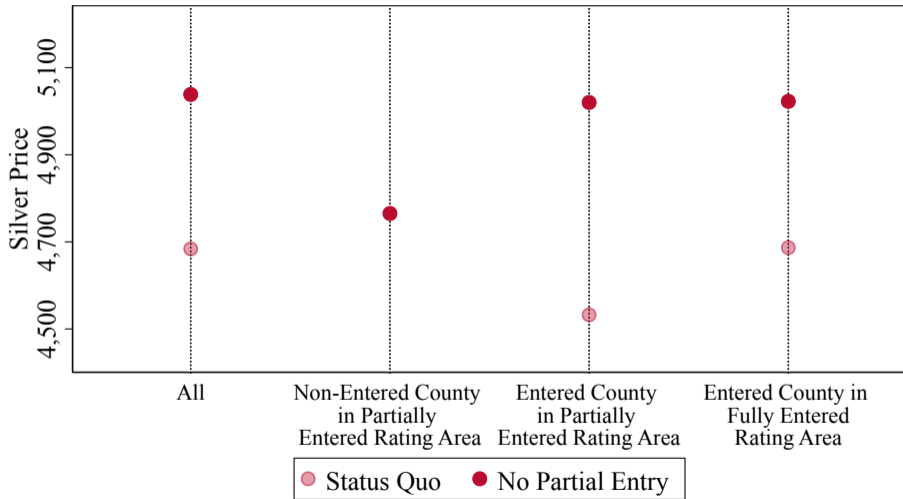
When partial entry is banned:

- ▶ More firms enter partially non-entered counties than exit partially entered
- ▶ Marginal insurers charge more

Prices Changes



Prices Changes



Eliminating Partial Entry Increases Entry

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| Avg. CS (\$) | . | 472.73 | 505.59 | |

When partial entry is banned:

- ▶ More firms enter partially non-entered counties than exit partially entered
- ▶ Marginal insurers charge more
- ▶ New entrants plus subsidy changes cause increased enrollment

One County Rating Areas Are Too Small

| Outcome | Observed | Model | No Partial Entry | County RAs |
|---------------------------|----------|---------|------------------|------------|
| Number of Firms | 2.47 | . | 3.11 | 2.08 |
| # Markets Unserved | 0 | . | 0 | 1 |
| Avg. Silver Price | 4740.23 | 4694.69 | 4958.12 | 5044.32 |
| Std Dev Avg. Silver Price | 384.54 | 174.74 | 287.69 | 808.22 |
| Avg. Enrollment | 30.31% | 30.63% | 31.40% | 26.93% |
| Avg. CS (\$) | . | 472.73 | 505.59 | 410.16 |

When rating areas are set at the county level:

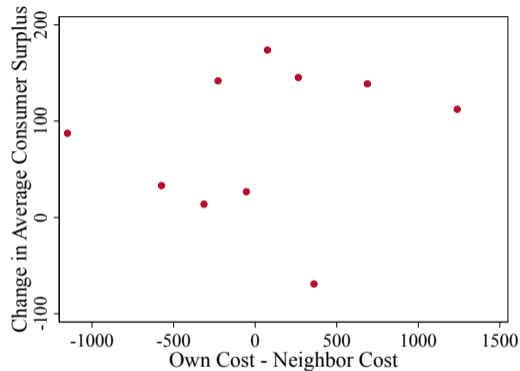
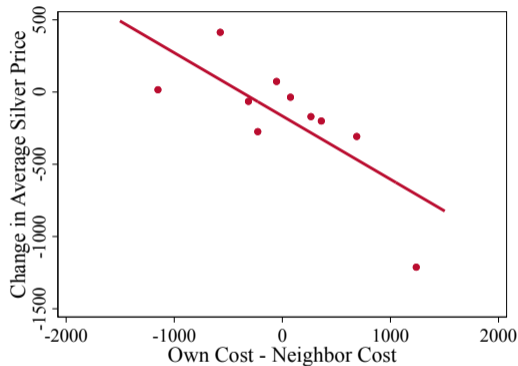
- ▶ Number of entrants falls
- ▶ One market goes unserved
- ▶ Price variation increases substantially

Grouping Counties Promotes Entry

| Outcome | County RAs | Two County RAs |
|---------------------------|------------|----------------|
| Number of Firms | 2.08 | 2.39 |
| # Markets Unserved | 1 | 1 |
| Avg. Silver Price | 5044.32 | 4862.59 |
| Std Dev Avg. Silver Price | 808.22 | 435.55 |
| Avg. Enrollment | 26.93% | 33.36% |
| Avg. CS (\$) | 410.16 | 497.14 |

- ▶ More firms enter
- ▶ One market goes unserved
- ▶ Price variation falls

Effects Vary By Heterogeneity of New Rating Area



- ▶ Variation in heterogeneity of marginal costs within rating areas >
- ▶ Benefits largest for homogeneous groupings

Conclusion

- ▶ Rating area design affects the equilibrium outcomes in health insurance markets
- ▶ Banning partial entry increases entry and prices
- ▶ Tradeoffs between size and heterogeneity
- ▶ Balance between risk pooling and competition


Thanks!

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Bounds on Fixed Costs

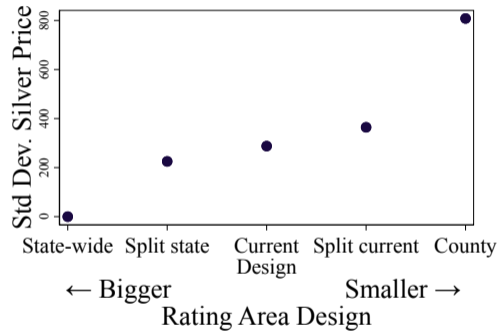
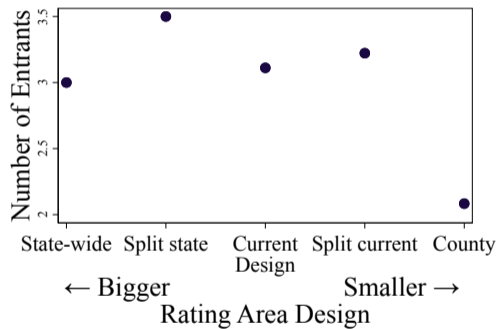
- ▶ Bounded above by deviation from entry to non-entry
- ▶ Bounded below by deviation from non-entry to entry
- ▶ ν_2 introduces a selection problem: not mean zero conditional on entry decision

Bounds on Fixed Costs

- ▶ Bounded above by deviation from entry to non-entry
- ▶ Bounded below by deviation from non-entry to entry
- ▶ ν_2 introduces a selection problem: not mean zero conditional on entry decision
- ▶ Solution: create unconditional inequalities (Eizenberg 2014) 
 - Assume fixed costs bounded by largest change in variable profits

Back

Trade-offs of Size, Without Partial Entry



[Alternative Outcomes](#)

[Back](#)

Appendix Table of Contents

- ▶ Literature Review >
- ▶ Geography and Partial Entry >
- ▶ Distribution of Price Differences >
- ▶ Cross State Summary Statistics >
- ▶ Prevalance by Geography >
- ▶ Enrollment >
- ▶ Other RF Outcomes >
- ▶ Balance >
- ▶ Robustness >
- ▶ FL/SC Placebo >
- ▶ Full RF >
- ▶ Prevalance by Insurer >
- ▶ Partial Entry Counts >
- ▶ Additional Plans >
- ▶ Bundle Example >
- ▶ Consumer Decision Problem >
- ▶ Demand Parameter Estimates >
- ▶ Age Curves >
- ▶ First Order Conditions >
- ▶ Dartmouth Adjusted >
- ▶ Dartmouth >
- ▶ MC Functional Form >
- ▶ MC Distribution >
- ▶ MC Population Density >
- ▶ MI Assumptions >
- ▶ FC Parameters >
- ▶ Shock Distributions >
- ▶ Effects By Entry: No Partial Entry Counterfactual >
- ▶ Enrollment Declines >
- ▶ Entrants v. Non-Entrants >
- ▶ Implementation of Counterfactuals >
- ▶ Model Validation: Entry >
- ▶ No Partial Entry Maps >
- ▶ County Maps >

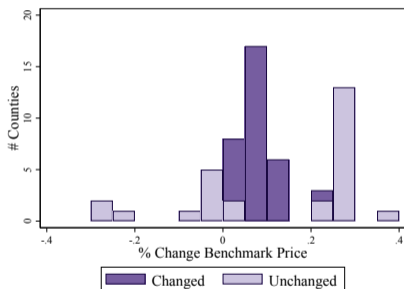
Colorado Rating Area Change

- ▶ 2014: 11 rating areas
- ▶ Garfield County threatens a lawsuit over grouping with high cost counties
- ▶ 2015: switch to 9 rating areas
- ▶ 2016: consider and reject move to single rating area

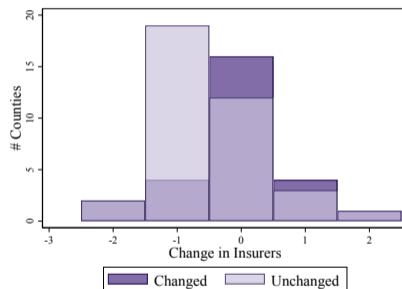
[Back](#)

Colorado Rating Area Change

- ▶ 37 counties unaffected by rating area change
- ▶ 27 counties end up in new larger rating areas



- ▶ Combined rating area results in flattened prices
- ▶ More entry (relative to unchanged area)
- ▶ More partial entry (relative to unchanged areas)



Texas Rating Area Change

- ▶ Follow default guidance: MSAs + 1
- ▶ 2023: switch to areas based on Public Health Regions (PHRs)

[Back](#)

- ▶ Price discrimination and entry

Maini and Pammolli 2020; Dubois and Lasio 2019; Cuesta and Sepulveda 2021

- Setting where demand, marginal costs, fixed costs matter; rules on both entry and pricing

- ▶ Health insurance exchanges

Dickstein et al 2015; Fang and Ko 2018; Starc and Ericson 2015; Orsini and Tebaldi 2017; Tebaldi 2017; Saltzman 2019; Polyakova and Ryan 2019

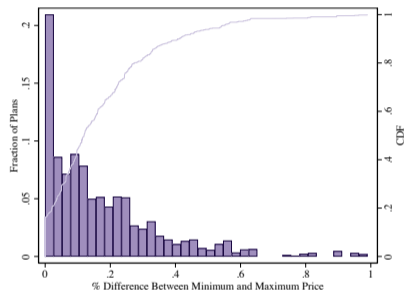
- Add entry dimension into analysis of rating policies

- ▶ Entry and moment inequalities

Ciliberto and Tamer 2009; Pakes 2010; Eizenberg 2014; Wollmann 2018; Ho and Pakes 2014; Fan and Yang 2020

- Apply entry and product positioning literature to health insurance

Distribution of Price Differences



Distribution of Price Differences

Back

Geography matters for partial entry decisions

| | (1) Insurer Partial | (2) Number of Insurers |
|----------------------------|------------------------|---------------------------|
| Metro Adj | 0.101*** (0.0220) | 0.271*** (0.0566) |
| Metro | -0.0168 (0.0234) | 0.487*** (0.0688) |
| N | 8112 | 8679 |
| R^2 | 0.0555 | 0.312 |
| Outcome Mean | | |
| County Controls, Year FEs? | Y | Y |

Standard errors in parentheses

* $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$

Cross State Summary Statistics

| | count | mean | sd |
|----------------------|-------|----------|----------|
| Cross-State HRR | 7805 | .2237028 | .4167518 |
| Cross-State HSA | 7805 | .1182575 | .3229335 |
| Cross State | 7805 | .2641896 | .440929 |
| Miles to Metro / 100 | 7805 | .6197539 | .7748957 |
| Observations | 7805 | | |

Prevalence by Geography

| | Insurer Partial | Plan Partial | Number of Insurers |
|--------------|-----------------|--------------|--------------------|
| Metro | .3606706 | .5101948 | 3.310376 |
| MetroAdj | .4639175 | .5940722 | 2.68299 |
| Rural | .3449683 | .50068 | 2.068676 |
| Total | .3797921 | .5273276 | 2.534816 |
| Observations | 8947 | | |

Back

State Lines and Enrollment

| | (1) % Enrolled | (2) % Silver | (3) % Bronze | (4) % Gold |
|----------------------|------------------------|-------------------------|-------------------------|-------------------------|
| Rural | 0.0107*** (0.00253) | 0.00529*** (0.00191) | 0.00349*** (0.00108) | -0.000561 (0.000517) |
| Miles to Metro / 100 | -0.00364 (0.00422) | -0.00509* (0.00287) | 0.00162 (0.00173) | -0.00234** (0.00109) |
| Cross State=1 | -0.00240 (0.00260) | -0.00482** (0.00188) | 0.00230* (0.00124) | -0.000347 (0.000503) |
| N | 8208 | 8208 | 8208 | 8208 |
| Outcome Mean | 0.279 | 0.188 | 0.0651 | 0.0130 |
| R2 | 0.705 | 0.607 | 0.583 | 0.409 |

Standard errors in parentheses

* $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$

Other Outcomes

| | (1) Deductible | (2) Avg Price | (3) % Paying Penalty | (4) Credit Per Return |
|----------------------|----------------------|---------------------|--------------------------|--------------------------|
| Rural | -51.89 (38.29) | 9.224*** (1.334) | 0.00125*** (0.000445) | 0.0136*** (0.00321) |
| Miles to Metro / 100 | -95.05*** (24.38) | 11.77*** (1.323) | 0.00266*** (0.000743) | 0.00239 (0.00491) |
| Cross State=1 | -36.79 (30.05) | 12.73*** (1.742) | 0.00158*** (0.000454) | 0.00510 (0.00355) |
| N | 8211 | 9050 | 3941 | 3941 |
| Outcome Mean | 3412.4 | 327.3 | 0.0420 | 0.174 |
| R2 | 0.283 | 0.776 | 0.675 | 0.628 |

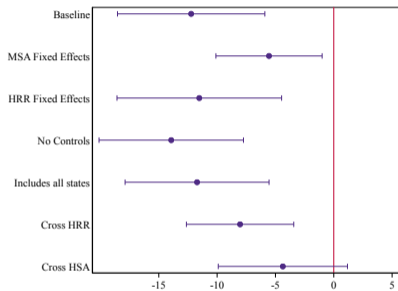
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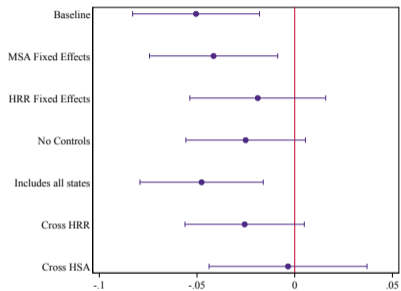
Balance Table

| Variable | Difference | |
|------------------------|------------|--------------|
| Population | -7,866.494 | (11,527.843) |
| Population Density | 7.632 | (24.224) |
| Median Income | -864.634* | (447.060) |
| Share Black | 0.004 | (0.005) |
| Share White | -0.003 | (0.006) |
| Share Hispanic | -0.005 | (0.005) |
| Share less high school | 0.001 | (0.002) |
| Share more high school | -0.001 | (0.004) |
| Share under 18 | -0.001 | (0.001) |
| Share $\leq 138\%$ FPL | -0.000 | (0.003) |
| Share 138-400% FPL | 0.000 | (0.002) |
| Observations | 2,255 | |

Robustness



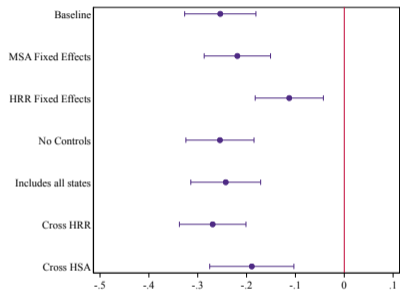
Rating Area Size



Insurer Partial Offering

Back

Robustness



Number of Insurers

Back

Other Regression Coefficients

| | (1) RA Size | (2) Missing Insurer? | (3) # Insurers | (4) Log(Price) |
|----------------------|----------------------|-------------------------|-----------------------|------------------------|
| Rural | 24.28*** (4.905) | 0.0866*** (0.0184) | -0.180*** (0.0370) | 0.0191*** (0.00596) |
| Miles to Metro / 100 | -19.00*** (3.014) | -0.0392*** (0.0149) | -0.163*** (0.0298) | 0.0474*** (0.00489) |
| Cross State=1 | -12.22*** (3.223) | -0.0505*** (0.0166) | -0.254*** (0.0372) | 0.0386*** (0.00649) |
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| | (1) | (2) | (3) |
|---------------|-------------------|-------------------|----------------------|
| | RA Size | # Insurers | Log(Price) |
| Cross State=1 | 0.0526 (0.114) | -0.122 (0.153) | -0.0617* (0.0359) |
| N | 451 | 451 | 451 |
| Outcome Mean | 22.85 | 2.477 | 8.161 |
| R2 | 1.000 | 0.776 | 0.866 |

Standard errors in parentheses

* $p < 0.1$, ** $p < 0.05$, *** $p < 0.01$

Variety of Prevalence of Partial Entry by Insurers

| | % Counties Partially Offered |
|---------------|------------------------------|
| Atrio | 0.312 |
| Bridgespan | 0.0250 |
| Kaiser | 0.658 |
| Lifewise | 0 |
| Moda | 0.106 |
| PacificSource | 0.467 |
| Providence | 0 |
| Trillium | 0.667 |
| Zoom | 0.250 |

Partial entry is common in this setting

Table: Number of Partially Entered Rating Areas

| Issuer | 2016 | 2017 | 2018 | 2019 |
|---------------|------|------|------|------|
| Atrio | 2 | 2 | - | - |
| Bridgespan | 0 | 0 | 1 | 1 |
| Kaiser | 3 | 3 | 3 | 2 |
| Lifewise | 0 | - | - | - |
| Moda | 0 | 4 | 3 | 3 |
| PacificSource | 0 | 3 | 3 | 3 |
| Providence | 0 | 0 | 0 | 0 |
| Trillium | 1 | - | - | - |
| Zoom | 1 | - | - | - |

How often do insurers offer additional plans?

On the Silver level, number of non-standard plans offered (max allowed is 4) across all rating areas:

| | 2016 | 2017 | 2018 | 2019 | 2020 |
|---------------|------|------|------|------|------|
| Atrio | 4 | 3 | - | - | - |
| BridgeSpan | 2 | 2 | 1 | 2 | 3 |
| Kaiser | 2 | 2 | 2 | 2 | 2 |
| LifeWise | 2 | - | - | - | - |
| Moda | 4 | 2 | 2 | 3 | 2 |
| PacificSource | 0 | 0 | 0 | 0 | 4 |
| Providence | 3 | 3 | 1 | 1 | 1 |
| Trillium | 0 | - | - | - | - |
| Zoom | 2 | - | - | - | - |

Example

Oregon's Rating Area 2: Benton, Lane, and Linn Counties

$$B = \{(None), (Benton), (Lane), (Linn), (Benton, Lane), (Benton, Linn), (Lane, Linn), (Benton, Lane, Linn)\}$$

Back x

Consumer Decision Problem

- ▶ Consumer i 's utility from plan j in market m (following Polyakova and Ryan 2019):

$$U_{ijm} = -\alpha_{d(i)} p_{ijm} + \gamma \cdot \mathbb{I}[y(i) \leq 250\%FPL] \times \mathbb{I}[AV_j = 70] + \delta_{jm} + \epsilon_{ijm}$$

where

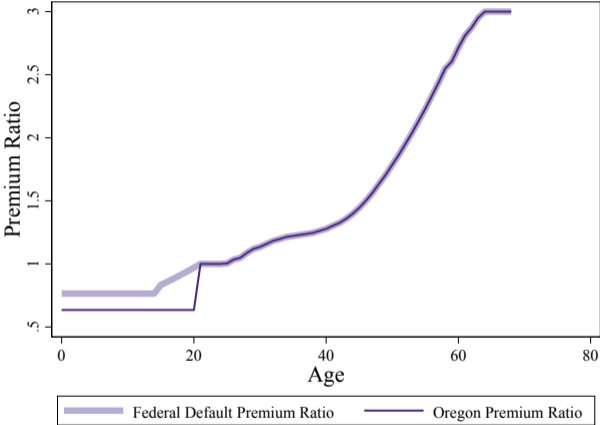
- p_{ijm} : price after subsidies and age rated
- δ_{jm} : average plan utility
- ϵ_{ijm} : i.i.d. extreme value
- Outside option: being uninsured

Demand Estimates

$$U_{ijm} = -\alpha_{d(i)} p_{ijm} + \gamma \cdot \mathbb{I}[y(i) \leq 250\% FPL] \times \mathbb{I}[AV_j = 70] + \delta_{jm} + \epsilon_{ijm}$$

| | Mean | Age <18 | Age 18-34 | Age 34-54 | Age 54-65 |
|-----------------------------|------------------|------------------|------------------|------------------|------------------|
| Coefficient on | | | | | |
| premium (α), \$1Ks | | | | | |
| Income $\leq 250\%$ | - | 3.685 (0.041) | 3.391 (0.190) | 3.786 (0.315) | 3.417 (0.113) |
| Income 250-400% | - | 0.729 (0.027) | 0.854 (0.107) | 0.811 (0.053) | 0.484 (0.002) |
| Income $> 400\%$ | - | 0.841 (0.028) | 1.177 (0.108) | 0.458 (0.036) | 0.157 (0.001) |
| Silver Boost (γ) | 2.576 (0.133) | - | - | - | - |

Age Curves



Age Premium Ratio Curves

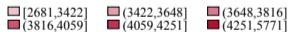
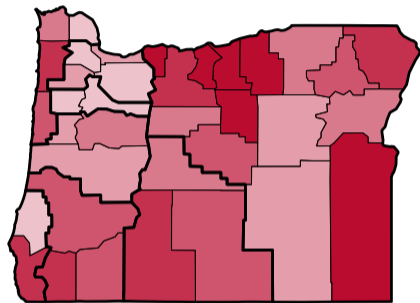
First Order Conditions

$$\text{Bronze : } \sum_m N_m S_{mb} + \sum_v p_{rv} \sum_m N_m \frac{\partial S_{mv}}{\partial p_{rb}} = \sum_v c_{bv} \sum_m N_m \frac{\partial S_{mv}}{\partial p_{rb}}$$

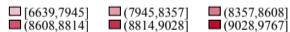
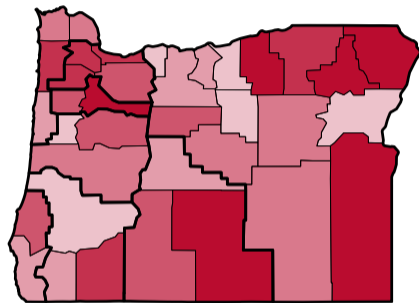
$$\text{Silver : } \sum_m N_m S_{ms} + \sum_v p_{rv} \sum_m N_m \frac{\partial S_{mv}}{\partial p_{rs}} = \sum_v c_{bv} \sum_m N_m \frac{\partial S_{mv}}{\partial p_{rs}}$$

$$\text{Gold : } \sum_m N_m S_{mg} + \sum_v p_{rv} \sum_m N_m \frac{\partial S_{mv}}{\partial p_{rg}} = \sum_v c_{bv} \sum_m N_m \frac{\partial S_{mv}}{\partial p_{rg}}$$

Marginal Cost Estimates: Step 3



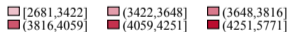
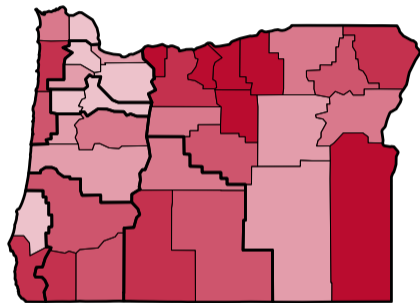
Average Silver Level Marginal Costs



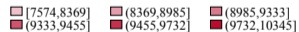
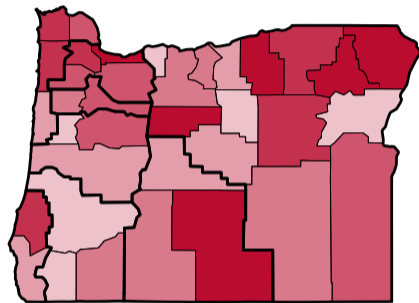
Dartmouth Atlas Price Adjusted Claims

Back

Marginal Cost Estimates: Step 3



Average Silver Level Marginal Costs



Dartmouth Atlas Claims

Back

Marginal Cost Functional Form

Assume marginal costs take the following functional form:

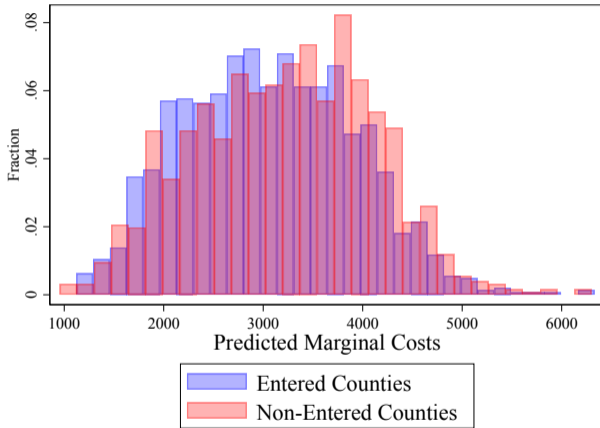
$$c_{nbv} = \alpha_n + \alpha_v + \beta_1 V_b + \beta_2 \text{Claims}_{vb} + \omega_{nbv}$$

where V_b are the weighted average of county characteristics and Claims_{vb} are the weighted metal level claims for exchange plans

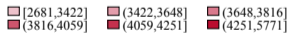
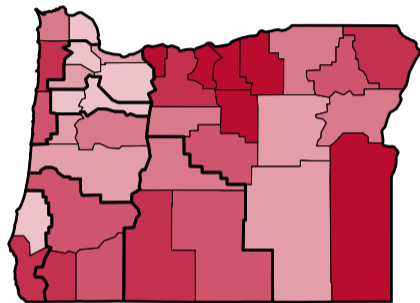
Then use this to get county specific marginal costs:

$$\hat{c}_{nmv} = \hat{\alpha}_n + \hat{\alpha}_v + \hat{\beta}_1 V_m + \hat{\beta}_2 \text{Claims}_{vm}$$

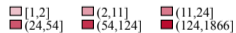
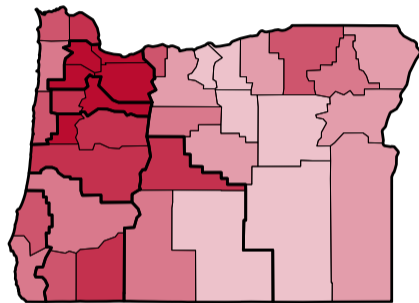
Marginal Cost Estimates Are Higher in Non-Entered Counties



Marginal Cost Estimates and Population Density




Silver Level Marginal Costs



Population Density

Back

Bounds on Fixed Costs

- ▶ Upper bound 

$$F_{nmt} \leq E[VP_{nt}(b_{nt}; \theta) - VP_{nt}(b_{nt} - 1^m; \theta)] = \overline{F_{mnt}}(\theta)$$

- ▶ Lower bound 

$$F_{nmt} \geq E[VP_{nt}(b_{nt} + 1^m; \theta) - VP_d(b_{nt}; \theta)] = \underline{F_{mnt}}(\theta)$$

Assumptions

Assumption 1: Bounded Support

$$\sup_{n,m} \{F_{nmt}\} = F_t^U < \infty, \inf_{n,m} \{F_{nmt}\} = F_t^L > -\infty$$

Assumption 2: Support Contained in Changes in Variable Profits

$[F_t^L, F_t^U] \subset \text{supp}(\text{expected change in variable profit due to entry or non-entry of a single firm in a single county in time } t)$

Let the support of the expected changes be denoted $[V_t^L, V_t^U]$

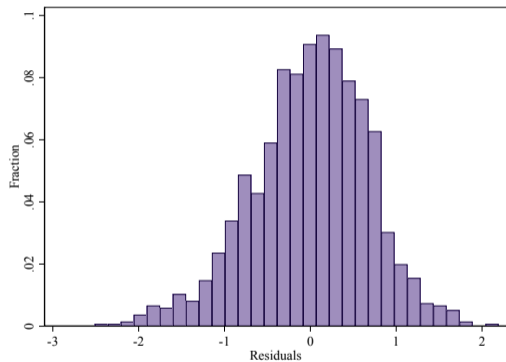
Then,

$$L_{nmt}(\theta) = \begin{cases} V_t^L(\theta) & m \in b_{nt} \\ \underline{F}_{nmt}(\theta) & m \notin b_{nt} \end{cases}$$
$$U_{nmt}(\theta) = \begin{cases} \overline{F}_{nmt}(\theta) & m \in b_{nt} \\ V_t^U(\theta) & m \notin b_{nt} \end{cases}$$

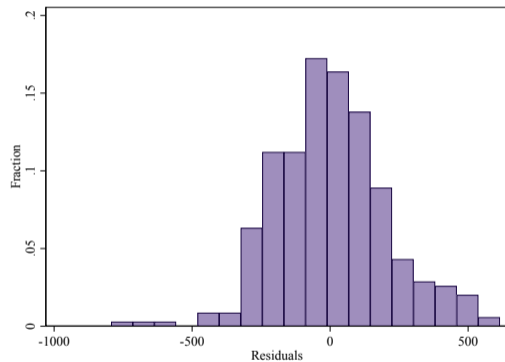
where

$$L_{nmt}(\theta) \leq F_{mnt} \leq U_{nmt}(\theta)$$

Distribution of Demand and Marginal Cost Shocks



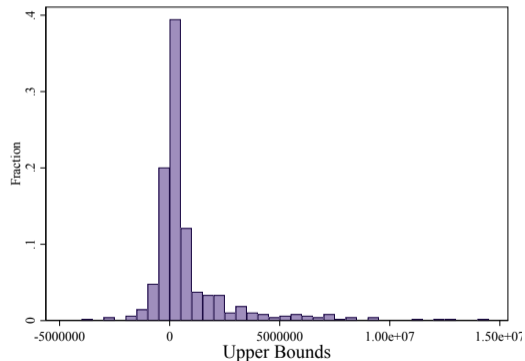
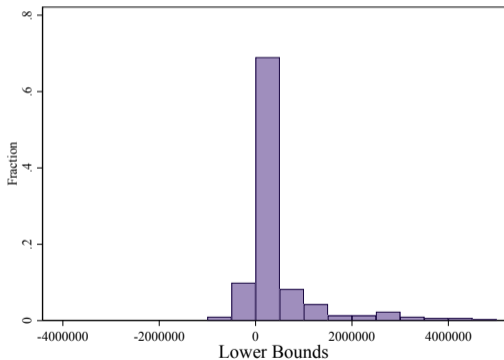
No Restricted Ratio



Marginal Costs

Distribution of Upper and Lower Bounds

- ▶ Simulate expected profits for observed entry decisions and one-county deviation entry and exit decisions



Implementation

- ▶ Take unconditional expectations over moment inequalities
- ▶ Interact with “instruments”
 - indicators for being in other counties in the rating area, in high ECP areas, being vertically integrated, and interactions of these characteristics
- ▶ Inference follows Chernozhukov, Chetverikov, and Kato 2018 (inference with a large number of moment inequalities) to construct the confidence set

[Inference Details](#)

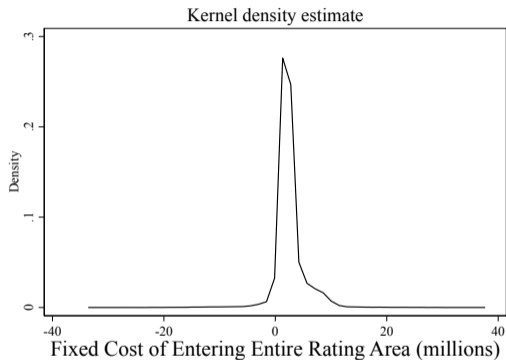
[Back](#)

$$T_n^{\max}(\theta) = \max\left[\max_j \frac{\sqrt{n}\bar{m}_{n,j}(\theta)}{\hat{\sigma}_{n,j}(\theta)}, 0\right]$$

where $\theta = \alpha, \beta, F_R$

Reject H_0 when $T > c$ to create the confidence set [Back](#)

Fixed Cost Estimates: Distribution of Estimated Rating Area Fixed Costs

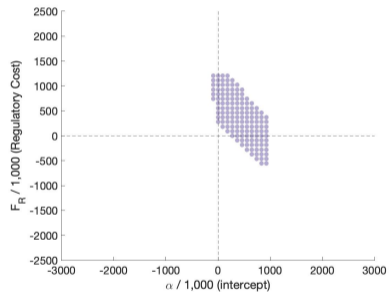
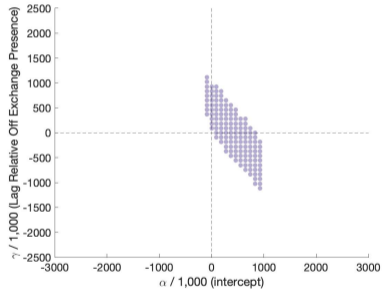
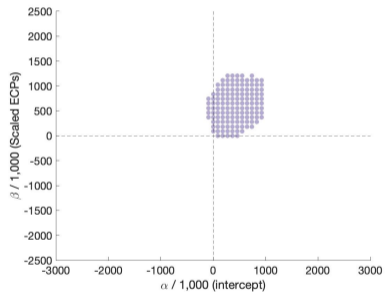


- ▶ Estimates largely between \$1-12 million

Parameters

Implementation

Fixed Cost Estimates: Parameters



Back

Different Effects in Partially Entered and Non Partially Entered Counties

| | Not Partially Entered | Partially Entered |
|----------------------------|-----------------------|-------------------|
| Change in Number of Firms | -0.20 | 0.96 |
| Change in Price | 76.99 | 340.62 |
| Change in Minimum Price | -60.62 | -243.69 |
| Change in Enrollment | -0.01 | 0.02 |
| Change in Consumer Surplus | -20.53 | 58.82 |
| Number of Counties | 10 | 26 |

[Back](#)

Enrollment Declines Example

- ▶ In the status quo:
 - County A has three entrants; counties B and C have two
 - Insurer 2 offers only to county A and sells at lower prices than the other two insurers
- ▶ If partial entry is disallowed, insurer 2 now sells to all three
 - The price of insurer 1's plan goes up
 - The benchmark plan changes in the newly entered counties
 - Prices consumer face go up decreasing enrollment
 - Equilibrium prices of the other two plans adjust to new market composition
 - Prices go up because more price sensitive consumers were priced out of market

| | Status Quo | | |
|---|------------|------|------|
| | 1 | 2 | 3 |
| A | 5500 | 4100 | 4500 |
| B | 5500 | . | 4500 |
| C | 5500 | . | 4500 |

| | Counterfactual | | |
|---|----------------|------|------|
| | 1 | 2 | 3 |
| A | 5600 | 4200 | 4700 |
| B | 5600 | 4200 | 4700 |
| C | 5600 | 4200 | 4700 |

Entrants v. Non-Entrants

| | Silver Price | Profits | Variable Profits |
|----------------------------|--------------|----------|------------------|
| Entered in Status Quo | 5155.8179 | 602068.3 | 763511.6 |
| New Counterfactual Entrant | 4450.8647 | 303974.7 | 552239.8 |

[Back](#)

Implementation of Counterfactuals

Run N simulations:

- ▶ Simulate demand and marginal cost shocks to calculate expected variable profits
- ▶ Draw values for F_{nmt} :
 - ① Take median estimate of α
 - ② Given the choice of α , take the median value of β conditional on α . Repeat for γ, F_r
 - ③ Simulate fixed cost shocks
 - Calculate $\hat{F}_n = \text{mean}(F_{nmt})$
 - Draw $\mu_{nmt} \sim N(0, .05 \cdot \hat{F}_n)$
 - Define $\hat{F}_{nmt} = \hat{\alpha} + \hat{\beta} \cdot \text{Presence}_{nmt} + \hat{\gamma} \text{ECP}_m + \mu_{nmt}$
- ▶ Vertically integrated firms restricted to only enter into places where they have an off exchange market presence

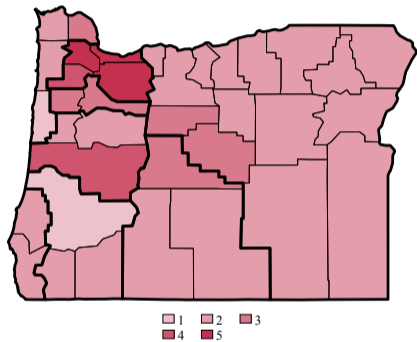
Rating Area 3: 2 counties

- ▶ Three issuers enter everywhere (Kaiser, Moda, Providence)
- ▶ Two issuers enter nowhere (Bridgespan, PacificSource)
- ▶ Couple of challenges:
 - 1,024 (4^5) possible equilibria to check: this is okay, but going to the 3 county case is a problem
 - Non-existence/multiple equilibria are possible
- ▶ I find one equilibrium: Kaiser, Moda, Pacific Source enter (only Moda fully)
- ▶ PacificSource is the least profitable firm who enters

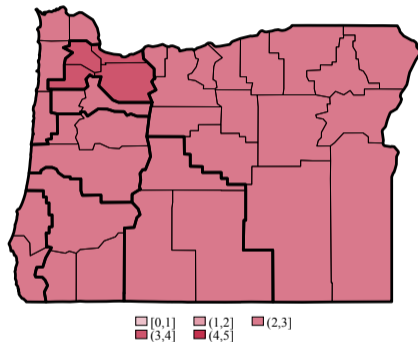
[Back to Results](#)

[Back to Model Validation](#)

No Partial Entry Counterfactual: Maps



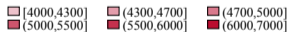
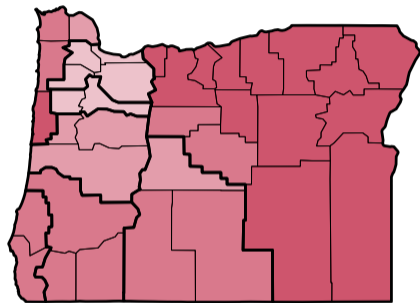
Number of Observed Entrants



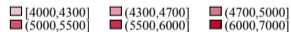
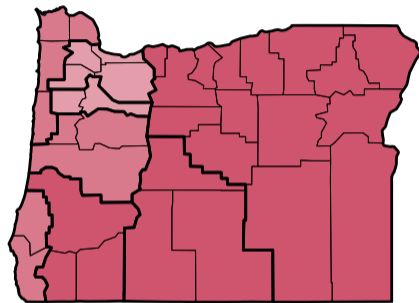
Number of Counterfactual Entrants

[Back to Results](#)

No Partial Entry Counterfactual: Maps



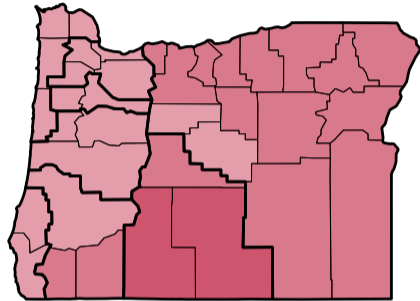
Observed Average Price of Silver Plans



Counterfactual Average Price of Silver Plans

[Back to Results](#)

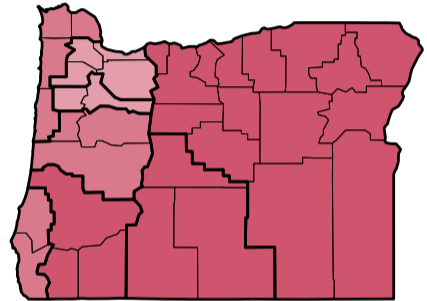
No Partial Entry Counterfactual: Maps



[4000,4300] [4300,4700] [4700,5000]
[5000,5500] [5500,6000] [6000,7000]

Model Average Price of Silver Plans: Holding Entry Decisions Fixed

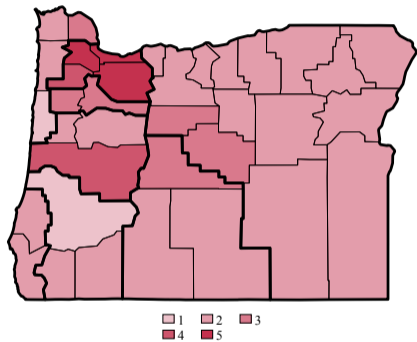
[Back to Results](#)



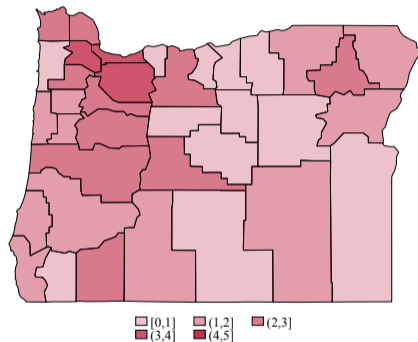
[4000,4300] [4300,4700] [4700,5000]
[5000,5500] [5500,6000] [6000,7000]

Counterfactual Average Price of Silver Plans

County Rating Areas Counterfactual: Maps



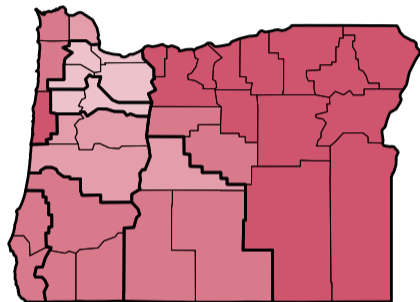
Number of Observed Entrants



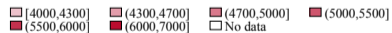
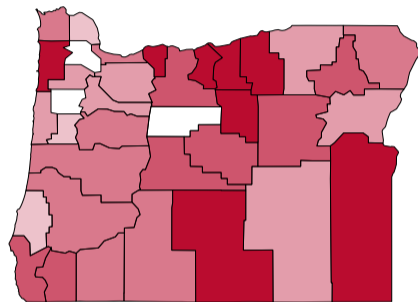
Number of Counterfactual Entrants

[Back to Results](#)

County Rating Areas Counterfactual: Maps



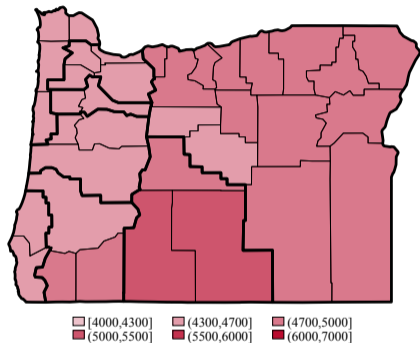
Observed Average Price of Silver Plans



Counterfactual Average Price of Silver Plans

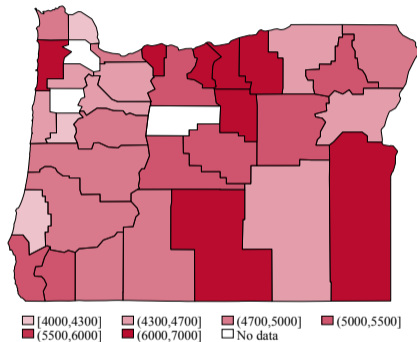
[Back to Results](#)

County Rating Areas Counterfactual: Maps



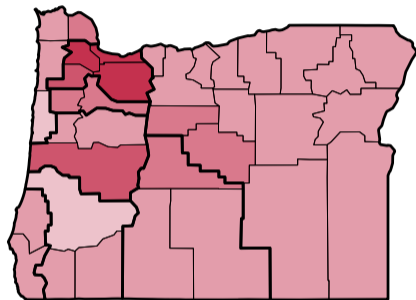
Model Average Price of Silver Plans: Holding Entry Decisions Fixed

[Back to Results](#)

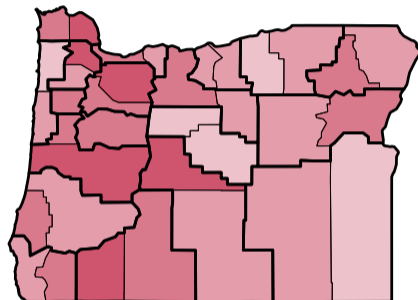


Counterfactual Average Price of Silver Plans

Two County Rating Areas Counterfactual: Maps



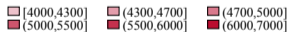
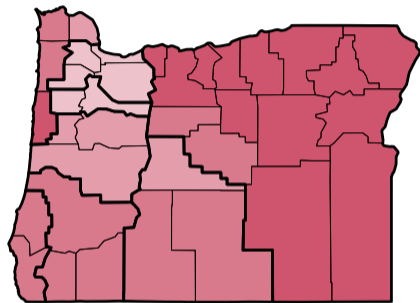
Number of Observed Entrants



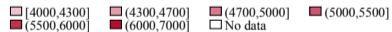
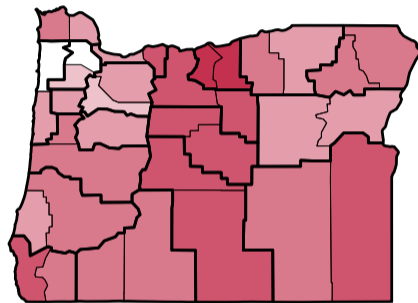
Number of Counterfactual Entrants

[Back to Results](#)

Two County Rating Areas Counterfactual: Maps



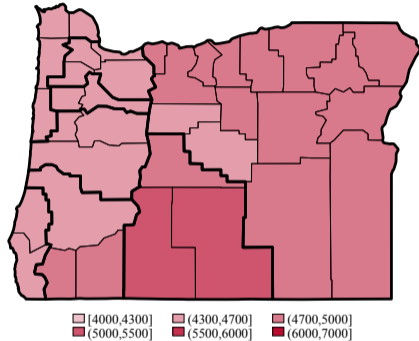
Observed Average Price of Silver Plans



Counterfactual Average Price of Silver Plans

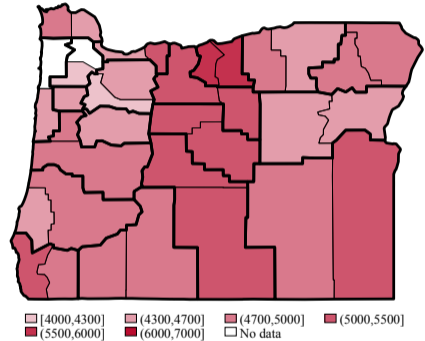
[Back to Results](#)

Two County Rating Areas Counterfactual: Maps



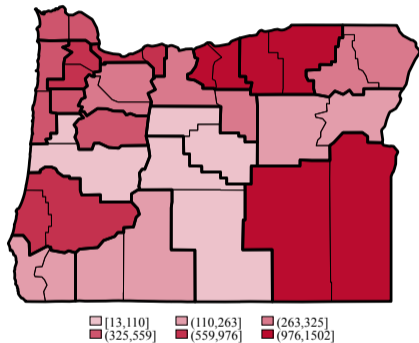
Model Average Price of Silver Plans: Holding Entry Decisions Fixed

[Back to Results](#)



Counterfactual Average Price of Silver Plans

Two County Rating Areas Counterfactual



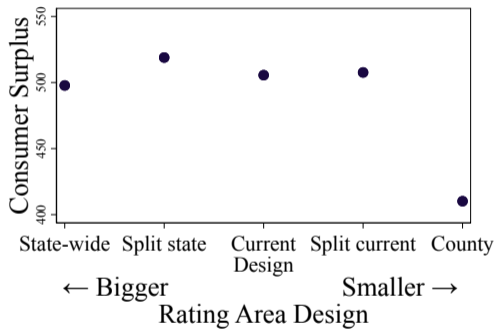
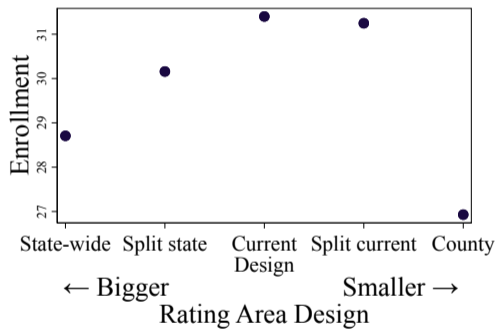
Back

Consequences of Ignoring Entry Adjustments

| Outcome | County RAs | County RAs: No Entry Adjustment | Two County RAs | Two County RAs: No Entry Adjustment |
|---------------------------|------------|---------------------------------------|-------------------|--|
| Number of Firms | 2.08 | 2.47 | 2.39 | 2.47 |
| # Markets Unserved | 1 | 0 | 1 | 0 |
| Avg. Enrollment | 26.93% | 30.40% | 33.36% | 32.12% |
| Avg. Silver Price | 5044.32 | 4776.37 | 4862.59 | 4777.94 |
| Std Dev Avg. Silver Price | 808.22 | 460.15 | 435.55 | 422.73 |
| Avg. CS (\$) | 410.16 | 463.92 | 497.14 | 481.40 |

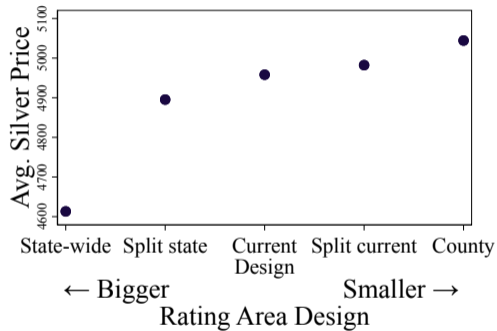
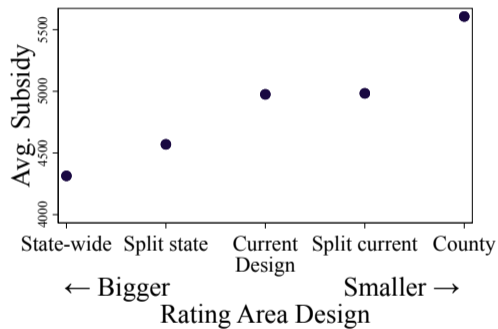
[Back](#)

Trade-offs of Size, Without Partial Entry



Back

Trade-offs of Size, Without Partial Entry



Back

Two County Rating Areas: Ban Partial Entry

| Outcome | Two County RAs | Two County RAs: No Partial Entry |
|---------------------------|----------------|----------------------------------|
| Number of Firms | 2.39 | 2.72 |
| # Markets Unserved | 1 | 0 |
| Avg. Enrollment | 33.36% | 29.76% |
| Avg. Silver Price | 4862.59 | 4872.85 |
| Std Dev Avg. Silver Price | 435.55 | 401.29 |
| Avg. CS (\$) | 497.14 | 473.79 |

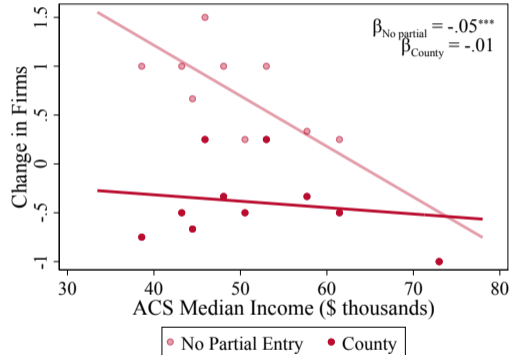
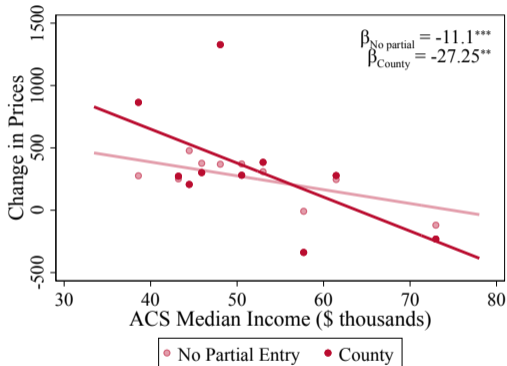
[Back](#)

Weighted Counterfactual Results

| Outcome | Observed | Model | No Partial Entry | County RAs |
|----------------------------|----------|---------|------------------|------------|
| Number of Firms | 3.66 | . | 3.45 | 3.18 |
| # Markets Without Entrants | 0 | . | 0 | 1 |
| Avg. Enrollment | 31.10% | 28.45% | 29.29% | 29.56% |
| Avg. Silver Price | 4342.12 | 4616.49 | 4666.20 | 4608.31 |
| Std Dev Avg. Silver Price | 361.99 | 138.58 | 295.21 | 482.64 |
| Avg. CS (\$) | . | 497.47 | 513.71 | 509.65 |

[Back](#)

Price and Entry Effects Vary By Income



Back

CS Effects Vary Less With Income

