

STATE OF VERMONT
GREEN MOUNTAIN CARE BOARD

In re: MVP 2015 Vermont Health Connect)
Rate Filing)
) GMCB-17-14-rr
)
SERFF No. BCBSVT-129560321)

OPPOSITION TO MOTION TO WAIVE HEARING

The Office of the Health Care Advocate opposes MVP's motion to waive the hearing in the above captioned case. Green Mountain Care Board rule 2.309 states that the Board can render a decision in a rate review case without holding a hearing if one of the following circumstances applies: 1) "all Parties waive their respective rights to a hearing and agree to submit to adjudication on the record;" 2) the proposed rate increase is no more than 10% and affects no more than 100 covered lives; or 3) the proposed rate increase is no more than 3%.

The Office of the Health Care Advocate does not waive its right to a hearing in this matter. In addition, the proposed rate increases for this filing span from 10.7% to 18.3% and affect 4,798 lives. Therefore, none of the circumstances allowing the Board to waive the hearing apply. We ask the Board to deny MVP's Motion to Waive the Hearing.

We would like to note that our opposition to the motion lies primarily in our concern that MVP has proposed a large rate increase for this filing and the filing impacts several thousand individuals. In addition, we believe it is premature to consider waiving the hearing as we have not had an opportunity to thoroughly assess all aspects of the filing including Lewis and Ellis's

actuarial opinion and DFR's solvency analysis or sufficient time to perform an independent analysis of the filing including determining whether additional information is needed from MVP.

s/ Kaili Kuiper

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CERTIFICATE OF SERVICE

I, Kaili Kuiper, hereby certify that I have served the above Opposition to Motion to Waive Hearing on Michael N. Donofrio, General Counsel to the Green Mountain Care Board, Judith Henkin, Health Policy Director of the Green Mountain Care Board, and Susan Gretkowski, representative of MVP Health Plan, by electronic mail, return receipt requested, this 9th day of June, 2014.

s/ Kaili Kuiper

Kaili Kuiper
Staff Attorney
Office of the Health Care Advocate