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April 12, 2017

Matt Lombardo
 MVP Health Insurance Company
 625 State Street
 Schenectady, NY 12305

Re: MVP Health Plan, Inc.
 3Q/4Q 2017 Vermont Large Group HMO Rate Filing
 SERFF Tracking #: MVPH-130977835
 Objection #1

Dear Mr. Lombardo:

The following additional information is required for this filing.

Trend

1. Please clarify what changes, if any, are being made to the manual rate. The memorandum states that "MVP is proposing not to change [the] manual rates," and trends are used "before blending the experience with the manual rate." However, the manual rates displayed in Exhibit 4a appear to show manual rates increasing at 1.1% per quarter.
2. It appears that the projected medical trend is being applied to both the Medical manual rate as well as the manual rate for the Rx riders. Was this intentional, or should the Rx riders be trended at the Rx trend rate?

Demographic Adjustments

3. Did MVP consider that the decrease in the demographic adjustment factors between 2Q and 3Q would result in a decrease to the manual rate for a quoted group? After applying the demographic adjustment to the proposed manual rates, it appears that the manual rate for a given group would be approximately 0.2% lower for 3Q than 2Q.

Non-Benefit Expenses

4. The revised Experience Rated Addendum for 3Q2017 does not include any consideration for the 18 V.S.A § 9374(h) Billback or the HCA assessment. Is it MVP's intention not to reflect this cost in the premiums, or is there an adjustment to past experience that is not captured in the Experience Rated Addendum?

Please be aware that we expect to have further questions regarding the filing as the review continues.

To ensure that the review of your filing has been completed before statutory deadlines, we expect you to respond as expeditiously as possible, but no later than April 21, 2017.

We trust that you understand these forms may not be used in Vermont until they are formally approved by the GMCB.

Sincerely,



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