



LEWIS & ELLIS

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972-850-0850
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September 20, 2018

Eric Bachner
MVP Health Insurance Company
625 State Street
Schenectady, NY 12305

Re: MVP Health Plan, Inc.
2019 Large Group HMO Rate Filing
SERFF Tracking #: MVPH-131604445
Objection #3

Dear Mr. Bachner:

The following additional information is required for this filing on behalf of the Office of the Health Care Advocate.

1. Explain if deviations from the manual rate for any large group covered by this filing are determined based on experience rating or on underwriting judgment. If underwriting judgment is used to determine large group rates, provide the underwriting guidelines or policies that assist the company in making such determinations.
2. Provide the overall average, and the range of actual rate increases, experienced by the groups covered by this filing for the last three years.

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

To ensure that the review of your filing is completed before statutory deadlines, we expect you to respond as expeditiously as possible, but no later than September 26th, 2018.

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

Sincerely,



Kevin Ruggeberg, ASA, MAAA
Associate Actuary
Lewis & Ellis, Inc.
KRuggeberg@LewisEllis.com
(972)-850-0850



625 State Street, PO Box 2207
Schenectady, NY 12301-2207
mvphhealthcare.com

September 26, 2018

Mr. Kevin Ruggeberg, ASA, MAAA
Lewis & Ellis, Inc.
P.O. Box 851857
Richardson, TX 75085

Re: 2019 Vermont Large Group HMO Rate Filing
SERFF Tracking #: MVPH-131604445

Dear Mr. Ruggeberg:

This letter is in response to your correspondence received 09/20/18 regarding the above mentioned rate filing. The responses to your questions are provided below.

1. Explain if deviations from the manual rate for any large group covered by this filing are determined based on experience rating or on underwriting judgment. If underwriting judgment is used to determine large group rates, provide the underwriting guidelines or policies that assist the company in making such determinations.

Response: Deviations from the manual rate are determined based on MVP's Experience Rating Formula, which was included as part of the original rate filing submission. One of the components of the formula is the Group Risk Assessment Factor (Section IV, line 5), which allows for modification of the blended experience and manual rate based on the underwriter's judgment.

As stated in the filed Experience Rated Addendum, "Adjustments may be made due to items such as poor claim and enrollment experience data being presented for new groups, the group's claim trend being historically different than the averages, variability in claims experience, participation levels/group size changes, plan sponsor contribution levels, number of plan offerings, plan sponsor and covered population stability, and plan sponsor persistency."

2. Provide the overall average, and the range of actual rate increases, experienced by the groups covered by this filing for the last three years.

Response: Please see the following table for this data. MVP has included renewals that occurred in 2016, 2017, and 2018 (as of July). Please note that in addition to experience rating, this data also includes groups who may have changed products upon renewal. The averages shown are a straight average (treating all groups equally) as well as a weighting based on premium at the time of renewal.

**VT Large Group Revenue Changes, by Group, Renewal
Periods 2016-2018**

Renewal Year	Minimum Increase	Maximum Increase	Average Increase	Average Increase (Premium Weighted)
2016	-8.82%	17.87%	2.29%	1.22%
2017	-8.52%	6.25%	-1.45%	-3.33%
2018	-7.00%	16.81%	3.92%	4.07%



625 State Street, PO Box 2207
Schenectady, NY 12301-2207
mvphealthcare.com

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Bachner".

Eric Bachner, ASA
Leader, Actuarial
MVP Health Care