

Guidance regarding Confidentiality Requests (Rate Review)

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In light of the increasing number of confidentiality requests received over the past few years of rate review, the Board has determined it is necessary to issue guidance with respect to certain categories of requests. In consultation with the Board's contracted actuaries, who work on all of the Board's rate filings, including large group, AHP, and QHP, Board staff have reviewed a number of confidentiality requests received from issuers in past years and determined that:

The following information shall be treated as confidential:

- RATEE Reports
- Provider-specific unit cost contracting terms

The following information shall not be treated as confidential:

- Block-level utilization data as shown in the attached sample formats

Pursuant to GMCB Rule 2.305 (Confidentiality) and the Board's standing Confidentiality Order, to request confidential treatment for materials noted above, an issuer still must: (1) clearly designate the specific materials claimed as confidential, (2) provide an explanation supporting its claim, including reference to the applicable provision(s) of 1 V.S.A. § 317(c) or any other law, and (3) provide redacted and unredacted copies of the materials to both Board staff and the HCA or other Recipients at the time of the confidentiality request (a redacted copy is not required if redactions would render the document meaningless or unintelligible).

This guidance may be cited as the explanation supporting a claim for confidentiality for the RATEE Report or provider-specific unit cost contracting terms; this guidance will not be grounds for requesting confidentiality for unit cost data/terms that are not specific to individual providers. Additionally, this guidance does not prevent the Board from determining that it is appropriate to treat utilization data provided at a more detailed level than the block-level data shown the attached sample formats as confidential where the issuer has provided sufficient justification.



MEDICAL TREND DEVELOPMENT
UTILIZATION TREND CALCULATION

Month	Membership	Original Claims*	Original PMPM	Rolling 12 PMPM	Adjusted Claims - Normalized for Contract Changes	Adjusted PMPM	Rolling 12 Adjusted PMPM	Regression on Adjusted PMPM - 36 Months	Regression on Adjusted PMPM - 24 Months	Regression on Adjusted PMPM - 12 Months
Jan-13	64,685	\$26,217,533	\$405.31		\$29,425,891	\$454.91		\$403.10	\$387.00	\$313.54
Feb-13	64,417	\$23,566,151	\$365.84		\$26,690,857	\$414.34		\$404.15	\$388.41	\$316.24
Mar-13	64,459	\$25,604,811	\$397.23		\$28,917,058	\$448.61		\$405.11	\$389.69	\$318.69
Apr-13	64,381	\$26,698,701	\$414.70		\$30,043,850	\$466.66		\$406.18	\$391.11	\$321.43
May-13	64,240	\$27,115,367	\$422.09		\$30,436,578	\$473.79		\$407.21	\$392.49	\$324.11
Jun-13	64,528	\$24,477,292	\$379.33		\$27,381,228	\$424.33		\$408.28	\$393.92	\$326.90
Jul-13	65,048	\$25,474,365	\$391.62		\$28,519,550	\$438.44		\$409.31	\$395.31	\$329.62
Aug-13	65,259	\$25,329,632	\$388.14		\$28,353,679	\$434.48		\$410.39	\$396.75	\$332.45
Sep-13	65,079	\$25,914,042	\$398.19		\$28,882,830	\$443.81		\$411.47	\$398.19	\$335.31
Oct-13	64,757	\$30,240,043	\$466.98		\$33,380,440	\$515.47		\$412.51	\$399.60	\$338.10
Nov-13	64,756	\$28,018,946	\$432.68		\$30,666,032	\$473.56		\$413.59	\$401.05	\$341.01
Dec-13	64,163	\$29,012,738	\$452.17	\$409.49	\$32,010,722	\$498.90	\$457.23	\$414.64	\$402.47	\$343.85
Jan-14	63,462	\$25,105,615	\$395.60	\$408.70	\$27,450,702	\$432.55	\$455.41	\$415.73	\$403.93	\$346.80
Feb-14	63,062	\$23,125,565	\$366.71	\$408.85	\$25,234,913	\$400.16	\$454.32	\$416.82	\$405.40	\$349.79
Mar-14	63,023	\$23,565,067	\$373.91	\$406.96	\$25,715,634	\$408.04	\$451.02	\$417.81	\$406.74	\$352.50
Apr-14	62,894	\$23,950,889	\$380.81	\$404.18	\$26,061,022	\$414.36	\$446.72	\$418.91	\$408.22	\$355.53
May-14	65,068	\$24,831,795	\$381.63	\$400.79	\$27,027,576	\$415.37	\$441.82	\$419.97	\$409.66	\$358.49
Jun-14	65,268	\$25,113,499	\$384.78	\$401.23	\$27,286,021	\$418.06	\$441.27	\$421.07	\$411.15	\$361.57
Jul-14	65,898	\$24,992,842	\$379.27	\$400.16	\$26,951,276	\$408.98	\$438.75	\$422.14	\$412.60	\$364.58
Aug-14	66,182	\$24,743,330	\$373.87	\$398.93	\$26,876,990	\$406.11	\$436.32	\$423.25	\$414.11	\$367.72
Sep-14	65,956	\$26,157,090	\$398.58	\$398.79	\$28,322,619	\$429.42	\$435.10	\$424.36	\$415.61	\$370.88
Oct-14	65,765	\$29,235,409	\$444.54	\$396.97	\$31,168,595	\$473.94	\$431.69	\$425.44	\$417.08	\$373.97
Nov-14	65,619	\$26,241,130	\$399.90	\$394.24	\$28,029,630	\$427.16	\$427.81	\$426.56	\$418.60	\$377.18
Dec-14	65,261	\$29,783,710	\$456.38	\$394.68	\$31,938,978	\$489.40	\$427.11	\$427.64	\$420.08	\$380.32
Jan-15	67,793	\$28,532,835	\$420.88	\$396.88	\$29,706,096	\$438.19	\$427.63	\$428.76	\$421.61	\$383.59
Feb-15	68,205	\$24,896,966	\$365.03	\$396.53	\$25,959,698	\$380.61	\$425.76	\$429.89	\$423.14	\$386.89
Mar-15	69,532	\$29,284,835	\$421.17	\$400.49	\$30,527,048	\$439.04	\$428.33	\$430.91	\$424.53	\$389.90
Apr-15	69,682	\$29,285,800	\$420.28	\$403.76	\$30,493,644	\$437.61	\$430.24	\$432.04	\$426.08	\$393.25
May-15	69,054	\$27,483,620	\$398.00	\$405.05	\$28,580,990	\$413.89	\$430.04	\$433.14	\$427.58	\$396.52
Jun-15	69,063	\$29,797,483	\$431.45	\$408.95	\$31,013,637	\$449.06	\$432.63	\$434.27	\$429.14	\$399.93
Jul-15	68,691	\$29,316,414	\$426.79	\$412.87	\$30,407,874	\$442.68	\$435.40	\$435.38	\$430.66	\$403.26
Aug-15	68,199	\$26,305,347	\$385.71	\$413.77	\$27,255,049	\$399.64	\$434.79	\$436.52	\$432.22	\$406.73
Sep-15	67,893	\$29,444,460	\$433.69	\$416.82	\$30,501,950	\$449.27	\$436.43	\$437.66	\$433.80	\$410.22
Oct-15	67,833	\$29,316,303	\$432.18	\$415.86	\$30,210,615	\$445.37	\$434.15	\$438.78	\$435.33	\$413.64
Nov-15	67,475	\$29,088,158	\$431.10	\$418.40	\$29,931,095	\$443.59	\$435.49	\$439.93	\$436.92	\$417.20
Dec-15	67,448	\$29,645,700	\$439.53	\$417.12	\$32,386,631	\$480.17	\$434.87	\$441.04	\$438.46	\$420.67
Jan-16	69,220	\$29,428,424	\$425.14	\$417.48	\$29,699,035	\$429.05	\$434.11	\$442.20	\$440.05	\$424.29
Feb-16	69,732	\$29,963,052	\$429.69	\$422.86	\$30,222,765	\$433.41	\$438.48	\$443.36	\$441.66	\$427.93
Mar-16	70,277	\$32,716,135	\$465.53	\$426.64	\$32,973,333	\$469.19	\$441.05	\$444.45	\$443.16	\$431.38
Apr-16	70,192	\$28,638,574	\$408.00	\$425.59	\$28,850,566	\$411.02	\$438.79	\$445.62	\$444.78	\$435.09
May-16	70,225	\$29,099,224	\$414.37	\$426.94	\$29,355,021	\$418.01	\$439.10	\$446.75	\$446.35	\$438.71
Jun-16	70,355	\$31,348,767	\$445.58	\$428.15	\$31,623,453	\$449.48	\$439.15	\$447.92	\$447.97	\$442.48
Jul-16	70,575	\$29,216,796	\$413.98	\$427.06	\$29,403,783	\$416.63	\$436.95	\$449.06	\$449.55	\$446.16
Aug-16	70,663	\$31,864,209	\$450.93	\$432.47	\$32,081,785	\$454.01	\$441.45	\$450.24	\$451.19	\$450.00
Sep-16	70,778	\$32,423,323	\$458.10	\$434.55	\$32,604,318	\$460.66	\$442.45	\$451.42	\$452.83	\$453.87
Oct-16	70,949	\$31,404,042	\$442.63	\$435.42	\$31,432,124	\$443.02	\$442.26	\$452.57	\$454.43	\$457.64
Nov-16	71,013	\$33,482,082	\$471.49	\$438.81	\$33,497,668	\$471.71	\$444.64	\$453.76	\$456.09	\$461.58
Dec-16	70,994	\$34,290,588	\$483.01	\$442.47	\$34,290,588	\$483.01	\$445.03	\$454.91	\$457.69	\$465.42
Annual Increase				6.1%			2.3%	3.1%	4.4%	10.6%

* December 2015 after normalization for contract changes was adjusted due to unexpected actual results. It originally was \$30,457,755.

Regressions

	Regression on Adjusted PMPM - 36 Months	Regression on Adjusted PMPM - 24 Months	Regression on Adjusted PMPM - 12 Months
1.000	12.293	1.000	3.052
0.000	1.199	0.000	2.147
0.206	0.054	0.196	0.052
8.843	34.000	5.357	22.000

MVP Historical Utilization / 1000 Data, January 2014 - December 2016, all lines of business (excluding Individual Indemnity)

Month	Raw Utilization Data			Members	Age Fx
	IP	OP	PHY		
201401	399.0	1955.0	10752.0	20,910	1.586
201402	469.0	1810.0	9018.0	20,556	1.586
201403	470.0	1931.0	9701.0	20,054	1.587
201404	446.0	1948.0	9870.0	19,745	1.587
201405	448.0	2023.0	10199.9	20,037	1.585
201406	334.0	1951.0	9303.0	19,685	1.590
201407	432.0	1965.0	9414.0	19,055	1.593
201408	556.0	1738.1	8496.3	18,837	1.596
201409	512.0	1911.1	8850.4	18,045	1.595
201410	445.5	1966.1	9387.5	17,524	1.599
201411	354.9	1542.8	7502.1	17,142	1.601
201412	323.9	1685.6	7907.0	16,370	1.601
201501	443.2	1332.8	7001.6	14,131	1.613
201502	281.2	1310.1	5943.1	14,073	1.613
201503	299.4	1451.7	6997.7	13,947	1.615
201504	167.2	1261.3	6489.8	13,752	1.620
201505	159.2	1186.3	6136.6	13,645	1.620
201506	196.1	1190.5	6404.8	13,373	1.622
201507	292.1	1236.3	6317.6	13,344	1.624
201508	251.0	1288.2	5868.7	13,283	1.624
201509	283.0	1307.9	6390.4	13,157	1.624
201510	235.0	1365.6	6471.4	13,064	1.625
201511	228.0	1312.2	5586.0	12,600	1.626
201512	244.1	1374.3	6024.4	12,477	1.628
201601	142.1	1008.6	5229.1	11,376	1.636
201602	221.0	1035.6	5427.7	11,462	1.635
201603	165.1	1223.9	6132.2	11,857	1.636
201604	243.8	1238.7	5728.0	11,813	1.640
201605	272.4	1200.0	5884.8	11,925	1.642
201606	242.8	1224.7	5930.1	12,087	1.643
201607	350.1	1245.9	5224.9	12,178	1.644
201608	313.6	1438.9	6118.0	12,175	1.647
201609	237.1	1182.3	5819.3	12,267	1.648
201610	232.0	1188.5	5961.1	12,233	1.652
201611	287.7	1342.7	6973.2	12,284	1.656
201612	183.0	1224.8	5983.7	11,841	1.659

Rolling 12 End Date	
201412	1
201501	2
201502	3
201503	4
201504	5
201505	6
201506	7
201507	8
201508	9
201509	10
201510	11
201511	12
201512	13
201601	14
201602	15
201603	16
201604	17
201605	18
201606	19
201607	20
201608	21
201609	22
201610	23
201611	24
201612	25

Utilization/1000 Member Months			Normalized Age Factor	Age Normalized Util/1000		
IP	OP	PHY		IP	OP	PHY
273.2	1180.6	5811.6	1.000	273.2	1180.6	5811.6
284.0	1183.0	5786.3	1.001	283.7	1181.5	5779.2
282.1	1190.8	5789.1	1.002	281.4	1187.8	5774.8
280.5	1198.1	5803.1	1.004	279.5	1193.5	5781.0
272.3	1192.8	5774.5	1.005	270.8	1186.4	5743.3
263.5	1180.5	5714.1	1.007	261.6	1172.0	5672.8
263.6	1171.7	5720.9	1.009	261.2	1161.3	5670.1
262.6	1160.5	5696.6	1.011	259.9	1148.4	5636.8
250.3	1166.4	5697.2	1.012	247.3	1152.4	5628.7
241.5	1157.6	5687.6	1.014	238.2	1141.8	5610.0
233.0	1145.5	5630.7	1.015	229.4	1128.2	5545.5
230.1	1160.3	5646.4	1.017	226.3	1141.1	5553.0
229.7	1165.1	5642.6	1.018	225.6	1144.1	5540.9
210.9	1160.8	5606.4	1.019	206.9	1138.7	5499.4
209.8	1159.1	5660.7	1.021	205.5	1135.8	5546.5
202.1	1157.1	5670.1	1.022	197.8	1132.5	5549.6
210.8	1170.1	5682.4	1.023	206.1	1144.1	5555.9
222.3	1184.7	5727.5	1.024	217.1	1157.0	5593.7
228.0	1197.7	5738.7	1.025	222.4	1168.5	5598.7
234.5	1208.0	5695.1	1.026	228.6	1177.3	5550.3
241.4	1229.5	5758.8	1.027	235.0	1196.8	5605.5
239.1	1226.6	5746.9	1.029	232.4	1192.4	5586.6
240.2	1219.0	5737.5	1.030	233.2	1183.3	5569.5
245.7	1224.2	5865.6	1.032	238.2	1186.5	5684.9
241.7	1217.1	5888.2	1.033	233.9	1177.7	5697.7

Calculation of MVP Best Estimate Utilization Trend, 2016 - 2018

	IP	OP	PHY
Value of Best Fit Line, Experience Period	237.3	1200.0	5660.3
Value of Best Fit Line, Rating Period	241.4	1209.5	5680.7
Total Utilization Trend	1.017	1.008	1.004
Annualized Utilization Trend	1.009	1.004	1.002