



March 12, 2019

Paul Schaeffer, FSA, MAAA
Actuarial Senior Director
Cigna Health and Life Insurance Company
900 Cottage Grove Road
Bloomfield, CT 06002

Re: Cigna Health and Life Insurance Company
Company NAIC # 67369; FEIN # 59-1031071
VT - Cigna LG Major Medical Filing 2019
SERFF Tracking # CCGP-131695464

Dear Paul Schaeffer:

We have been retained by the Green Mountain Care Board (“GMCB”) to review the above referenced group products filing submitted on 2/7/2019. The following additional information is required for this filing and is being submitted on behalf of the Office of the Health Care Advocate.

Notice regarding proper responses:

- A minimum-acceptable response to quantitative questions from us must include a spreadsheet calculation with retained formulas such that we can replicate the calculations therein.
- Explanatory responses are merely a supplement to the spreadsheet material and in of themselves will constitute a lack of response.

Questions:

1. Please identify instances, if any, of deviations of more than 10% from the approved 2018 manual rate for large groups in this book of business. For each instance of +/-10% deviation from the approved manual rate, what is the magnitude of the deviation that is attributable to factors other than group experience and credibility as detailed in the rate filing (i.e. to underwriting discretion and/or management decision)?
2. Please provide the premium-weighted mean rate, the arithmetic mean rate, the median rate, the rate range, the type of distribution of the rates (e.g. normal, Gaussian, bimodal, etc.), and the number of groups for this book of business for each year of the three most recent calendar years for which there is data.

3. Are there written guidelines for when and how underwriting or management discretion is applied to a rate? If so, please provide any written guidelines related to the exercise of underwriting discretion that will be used by underwriters or management when developing rates for this book of business.

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 to every objection in our letter, but no later than March 19, 2019. Note that the responses can be submitted separately and do not have to be submitted all at the same time.

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

Sincerely,



Xiaoxiao Lisa Jiang, FSA, MAAA
Consulting Actuary



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