



February 15, 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 Mr. Schaeffer:

Lewis & Ellis, Inc (L&E) have been retained by the Green Mountain Care Board ("GMCB") to review the above referenced Large Group product filing submitted on 02/07/2019. Upon review of the actuarial memorandum and related information submitted, the following additional information is needed:

1. As shown under "Rate Review Detail" of SERFF submission, the weighted average prior rate is \$579.62 PMPM. Please illustrate how this amount reconciled to the approved rate from the prior filing.
2. The VT trend assumptions shown in Table 27 and Table 28 are different from those shown in the Supplemental Exhibits. Which set of medical trend assumptions is correct? Please confirm that the correct trend assumptions are being used in pricing, if not, please provide updated supporting documentation and rate manual with the corrected medical trend assumptions.
3. Please provide a breakdown of the -3.60% overall rate impact by major category of change, which includes but are not limited to:
 - a. Updating rating variables on a 1/1/2019 basis (e.g., area factors and trends for medical and Rx respectively);
 - b. Approved trend from the prior filing;
 - c. Change in proposed MLR.

In addition, please provide additional support for each of the components identified in the above breakdown with detailed sources of the referenced figures and/or derivation, as well as any other information that may be helpful with our review. For example, if there is any impact from neutralizing the methodology impact between national and Vermont rating, or if the baseline has changed, please specify.

4. Provide the derivation of the projected federal MLR for 2019, starting with the target loss ratio.
5. Please explain any significant changes in the retention assumptions from the prior filing and explain how the retention assumptions in this filing compare to experience.

Please respond as soon as possible, but no later than February 22, 2019.

Our review of filing will be placed in suspense pending your response. Contact me if you have any questions.

Sincerely,



Xiaoxiao Lisa Jiang, FSA, MAAA
Consulting Actuary



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