



June 12, 2020

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

Re: MVP Health Plan, Inc.  
2021 Vermont Exchange Rate Filing  
SERFF Tracking #: MVPH-132371260  
Objection #3

Dear Mr. Bachner:

The following additional information is required for this filing.

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:

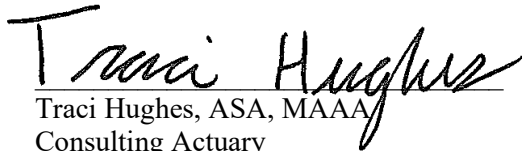
1. Regarding the response to question #4 of objection 1 – Please provide further quantitative support for how these Rx trends are applied and how the resulting trended allowed PMPMs reconcile with the Rx trended allowed PMPM in the URRT, as well as the unit cost and utilization year 1 and year 2 trends in the URRT.
2. Regarding the response to question #7 of objection 1 – Please provide a breakdown of the general administrative load of \$43.75 provided in Exhibit 5. Please provide a similar breakdown for the load as filed in 2020 of \$42.00 and elaborate on any material differences.
3. Regarding Exhibit 2b of “VT 2021 Exchange Rate Filing\_SERFF\_LE.xlsx” – the total trends in cells F23:F25 do not equal the weighted average of the trends for each drug class in cells C23:E25 when weighted by the experience period allowed PMPM in cells C16:F16. Please reconcile.
4. For each month from January 2016 through March 2020, total allowed costs member months, and any normalization factors appropriate to normalize for changes in unit costs, population age factors, and induced utilization.
5. Please split the 0.6% plan design change adjustment into the two components discussed on page 5 of the Federal Actuarial Memo, CSR and benefit relativities, and provide quantitative and qualitative support for each component.

6. Please explain why the induced demand factors in Exhibit 7 do not match HHS factors as stated on page 6 of the Federal Actuarial Memorandum.
7. Please provide the bad debt as a percentage of premium over each of the last 3 years.
8. How has COVID-19 affected non-benefit costs (expenses such as claims adjudication, overhead, travel, profit, etc.)?
9. Describe how Vermont consumers were considered in light of the current savings due to the COVID-19 pandemic and this unprecedented time.

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 June 19, 2020.

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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