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August 29, 2019

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

Re: MVP Health Plan, Inc.
2020 Large Group HMO Rate Filing
SERFF Tracking #: MVPH-132048265

Dear Mr. Bachner:

The following additional information is required for this filing.

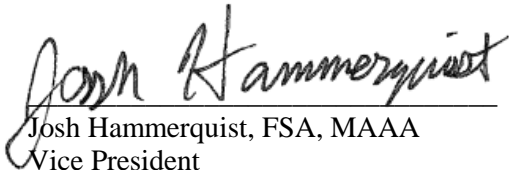
1. Provide detailed quantitative support for the medical unit cost trend and the pharmacy unit cost and utilization trends.
2. Discuss the credibility of the base period experience. What are the suspected drivers of the worse than expected experience?
3. Describe how the 10.9% increase to the quarterly manual rate translates to an annual increase of 15.6%.
4. Provide quantitative support for the pooling charge of 9.92% for claims above \$100,000 and also provide the historical experience of claims above \$100,000 over the past five years for this block.
5. Provide support for the 3.206 IBNR factor given the two months of claim run-out that was used. Provide actual to expected IBNR estimates for the prior 3 years.
6. Clarify if the calculation of the \$0.82 PMPM for the reclassification of antidepressants and antipsychotic/antimanic agents as preventive is based on claims that occurred before the deductible or for claimants who would not have hit the deductible with these claims removed.
7. Provide quantitative and qualitative support for the \$3.86 Medical Home and PCP Incentive.
8. Provide additional qualitative support for the rationale behind making the adjustment on line 14b of Exhibit 3a.
9. Provide quantitative and qualitative support for the 5.5% increase for the PMPM administrative costs.
10. Provide the actual historical average increase for the Covered Lives Assessment.
11. Provide quantitative support for the 1.0% assumption for the ACA Insurer Tax.
12. Provide quantitative support for the calculation of the value of the benefits associated with the Safe Harbor riders.
13. Provide quantitative support for the calculation of the value of the updated wellness program.
14. Please confirm that the Experience Rated Addendum will be filed each year and anytime a change is made to the factors within.
15. Please confirm that the Experience Rating Formula will be filed anytime a change is made.

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 6th, 2019.

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

Sincerely,



Josh Hammerquist, FSA, MAAA
Vice President
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