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September 27, 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. Please provide additional substantive exhibits demonstrating quantitatively why the increase to the manual rate is significantly higher than trend. Please include the impact of underwriting discretion and experience rated groups.
2. In the previously response to round 3, question 2, please include the premium for these groups.
3. Please provide additional qualitative and quantitative support for the expected change in the average underwriting factor from the base period to the projection period.

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 30<sup>th</sup>, 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  
Lewis & Ellis, Inc.  
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