

October 31, 2022

Attn: Maria Mahmood  
900 Cottage Grove Road  
Hartford, CT 06152-1233

Re: Cigna Health and Life Insurance Company  
SERFF Tracking #: CCGP-133388045  
2022 Large Group Rate Filing

Dear Maria:

Please provide the answers to the following questions, requested on behalf of the Office of the Health Care Advocate.

1. Provide the number of members subject to the Out of Pocket Adjuster Program (“the Program”) described in Table 51 of Appendix B of the filing.
2. Explain how members who are subject to the Program are notified that they are subject to the Program (e.g., in the plan description only, in the plan description and via separate letter, etc.).
3. Detail what percent of the benefit of pharmaceutical manufacturer co-pay assistance coupons CHLIC realizes under the Program.
4. Explain whether the Program applies only to medications for which there is an appropriate generic version available or also apply to medications where a brand version is the only version available.
5. Explain whether any policies covered by this filing include a specialty-tier exclusion or so-called specialty carve out whereby drugs determined by CHLIC to be specialty drugs are not covered.
6. Explain whether the Mandatory Mail for Maintenance Drugs benefit and the Rx Exclusive Specialty Home Delivery (ESHD) benefits described in Table 51 of Appendix B of the filing comply with amendments made by Act 131 (2022) to 8 V.S.A. § 4089j and whether the Vermont Department of Financial Regulation approved the relevant policy forms.
7. If adjustments need to be made to the Mandatory Mail for Maintenance Drug benefit and the ESHD benefit to comply with amendments to 8 V.S.A. § 4089j, explain them and provide supporting documentation and calculations.

We appreciate responses as expeditiously as possible to every objection in our letter, but no later than November 7, 2022.

Sincerely,

Allison Young, ASA, MAAA  
Consulting Actuary  
Lewis & Ellis, Inc.  
ayoung@lewisellis.com