

STATE OF VERMONT  
GREEN MOUNTAIN CARE BOARD

In re: MVP Health Plan, Inc. )  
VT Health Connect 2021 Filing ) GMCB-006-20rr  
)

**RESPONSE TO MVP OBJECTION TO HCA ACTUARIAL QUESTIONS**

On June 15, 2020, MVP Health Plan, Inc. (MVP) filed a pleading (MVP Objection) with the Green Mountain Care Board (Board) objecting to and declining to substantively respond to four of the Office of the Health Care Advocate's (HCA) eight actuarial interrogatories which the HCA submitted to the Board on June 8, 2020. MVP objected to and declined to respond to HCA Interrogatories 5, 6, 7, and 8.

The HCA continues to suggest that the Board ask MVP the eight actuarial questions as submitted. We carefully vetted our short list of actuarial questions before submitting the list to the Board, and we believe the questions are reasonable and appropriate. Further, the relevance of our questions to the filing and the Board's review is clear. We therefore will not respond to MVP's relevancy arguments here. However, if the Board wishes us to additionally brief the issue of relevance, we are happy to oblige. In an effort to avoid delaying the process further, the HCA is limiting our response to three points:

- 1) MVP expresses concerns that its answers to Interrogatory 5 could be misleading. In addition to filling in the table, MVP is welcome to provide any explanation it feels necessary to avoid misleading responses, in the same fashion that it did last year. See GMCB-005-19rr, MVP Responses to Objection Letter #3.

- 2) MVP states that it intends to respond to Interrogatories 6 and 7 in its pre-filed testimony. The HCA submitted Interrogatories 6 and 7 in order to receive clarifications on two very specific points. Potential pre-filed testimony is not an adequate substitute.
- 3) MVP states that it cannot distinguish its new enrollment due to the Covid-19 special enrollment period (SEP) from its new enrollment due to other SEPs. If MVP is not able to make this distinction, the HCA asks MVP to provide the combined new enrollment numbers with a note explaining what the data represents.

Dated at Montpelier, Vermont this 16th day of June, 2020.

*s/Eric Schultheis*

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**CERTIFICATE OF SERVICE**

I, Kaili Kuiper, hereby certify that I have served the above RESPONSE TO MVP OBJECTION TO HCA ACTUARIAL QUESTIONS on Michael Barber, Green Mountain Care Board General Counsel; Amerin Aborjaily, Green Mountain Care Board Staff Attorney; and Gary Karnedy, Ryan Long, and Michelle Bennett, representatives for MVP Health Plan, Inc., by electronic mail, return receipt requested, this 16th day of June, 2020.

s/ Kaili Kuiper

Kaili Kuiper, Esq.

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