



June 19, 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 #4

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. Please specify whether the filing assumes that MVPHP will be responsible for billing consumers who purchase plans on Vermont Health Connect (VHC) in 2021. List any changes to the filing that are needed to reflect that MVPHP will not be responsible for consumer billing in 2021.
2. Do cost sharing plans take more administrative time than other QHPs and therefore represent a larger portion of administrative costs? If yes, does MVPHP “silver stack” these costs or spread them out across all plans?
3. Please provide an update of your PBM’s actual-to-expected trend analysis for the last four years.
4. MVPHP has experienced large growth in its VHC population over the last few years. Please provide any assumptions built into the filing for the increase in membership or change in membership mix, including the following:
 - a. Changes in pooling level, and
 - b. Impact from mix of individual or small groups.
5. Please confirm the accuracy of the below-provided table that lists proposed rates and rate components, allowed (ordered) rates and rate components, and actual rate components. If the

cell is blank or you believe the value listed is incorrect, please provide the value that you believe is correct.

In your response, please provide any caveats or qualifications that are necessary to prevent the response from being misleading.

Year Filed		2020	2019	2018
Docket #		GMCB-006-20r	GMCB-005-19rr	GMCB-008-18rr
Members		36,980	30,887	25,223
Average Rate Change	Proposed	7.3%	10.9%	10.9%
	Allowed	NA	10.1%	6.6%
Allowed Medical Trend	Proposed		3.7%	3.2%
	Allowed	NA	4.7%	3.4%
	Actual*	NA	NA	
Medical Unit Cost Trend	Proposed		3.7%	3.2%
	Allowed	NA	3.7%	3.4%
	Actual*	NA	NA	
Medical Utilization	Proposed	1%	0%	0%
	Allowed	NA	1%	0%
	Actual*	NA	NA	
Average Annual Allowed Rx Trend	Proposed	7.3%	8.2%	13.3%
	Allowed	NA	8.2%	13.3%
	Actual*	NA	NA	
General Administrative Load (PMPM)	Proposed	\$43.75	\$42.00	\$39.80
	Allowed	NA	\$42.00	\$39.80
	Actual*	NA	NA	
CTR	Proposed	1.5%	1.5%	2%
	Allowed	NA	1%	1.5%

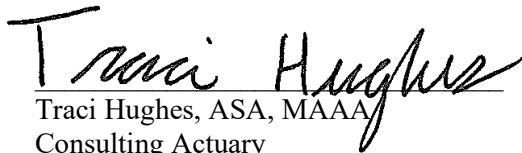
* Actual is for the year that the rates are effective for. For instance, for the column "2018", the actual field should be populated with the experience of 2019 (the year the rates are effective for).

6. MVPHP is proposing an increase for pent-up demand from Covid-19. These are services which were expected to be performed in 2020. As such, the HCA expects that the cost was built into the premium rates for 2020. Please demonstrate how this additional cost in 2021 premiums is not double charging members.
7. In your response to question 14 of Objection Letter 1, you state that your assumption of an 80% Covid-19 vaccine rate is "consistent with the paper published by Wakely." Please confirm that you are referring solely to the sentence in the last paragraph on page 11 of Wakely's March 30, 2020 Covid-19 Cost Scenario Modeling paper which begins, "For example..." If you believe the paper provides additional support for your assumption of an 80% vaccination rate beyond this sentence, please specify where this support is.
8. Vermont implemented a special enrollment period (SEP) in response to the Covid-19 crisis which is still open. Please provide the number of Vermonters who have enrolled in an MVPHP plan using this SEP, broken out by CSR plan and metal level.

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 26, 2020.

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

Sincerely,

A handwritten signature in black ink that reads "Traci Hughes". The signature is written in a cursive style with a horizontal line underneath the name.

Traci Hughes, ASA, MAAA
Consulting Actuary
Lewis & Ellis, Inc.
thughes@LewisEllis.com
(972)-850-0850