



August 31, 2021

Matt Lombardo  
MVP Health Insurance Company  
625 State Street  
Schenectady, NY 12305

Re: MVP Health Plan, Inc.  
2022 Large Group HMO Rate Filing  
SERFF Tracking #: MVPH-132824950

Dear Mr. Lombardo:

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. Regarding the response to question #5 of the previous objection – The 2022 trends provided in the response do not appear to match the submitted charge requests from Appendix 2 of the budget submissions. We believe the response should be updated as follows:

Facility	Service Type	Appendix 2 Charge Request from 2022 Budget Submission
North Country Hospital	IP	5.6%
North Country Hospital	OP	5.6%
Northeast Vermont Regional Hospital	IP	3.4%
Northeast Vermont Regional Hospital	OP	3.4%
Northwestern Medical Center	IP	3.6%
Northwestern Medical Center	OP	3.6%
Rutland Regional	IP	4.0%
Rutland Regional	OP	4.2%
Rutland Regional	Phys	-0.3%
Springfield Hospital	IP	-2.2%
Springfield Hospital	OP	11.0%

Please reconcile.

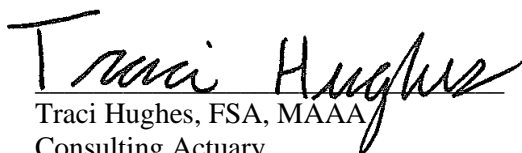
2. Regarding the response to question #8 of the previous objection – what are the drivers of the large pharmacy trend observed in 2020? Are these drivers expected to continue in the future? If so, why?
3. Exhibit 2a indicates an assumed 2020/2019 trend of 22.9%, how was this assumption adjusted and chosen given the actual observed 2020/2019 trend of 53.9%?
4. The actual 2020/2019 Rx trend was an outlier compared to the prior three years of Rx trend. The Rx trend assumptions for 2021-2023 are more than double the average observed Rx trend from 2017-2019. Based on the correspondence to date, there is not enough justification and support for the projected trend that is higher than the levels that have been observed historically. Please provide justification for the Rx assumption and why it is expected that the trends will not return to normal levels. Please note that reliance on the PBM is not sufficient, especially given the historical over-estimation that has been presented.
5. Regarding the response to question #13 of the previous objection – Please provide a similar table to the 2020 flu vaccine table provided but for the actual 2020 COVID vaccine. Please only include the utilization and cost information that was borne by MVP, outside of the VT Vaccine Pilot.

Please be aware 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 7, 2021.

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

Sincerely,



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