



625 State Street, PO Box 2207
Schenectady, NY 12301-2207
mvphhealthcare.com

July 30, 2021

Michael Barber
Green Mountain Care Board
144 State Street
Montpelier, VT 05602

Re: MVP Health Plan, Inc.
2022 Individual Market Rate Filing
SERFF Tracking #: MVPH-132824950, GMCB Docket #: GMCB-007-21rr

MVP Health Plan, Inc.
2022 Small Group Market Rate Filing
SERFF Tracking #: MVPH-132824927, GMCB Docket #: GMCB-008-21rr

Dear Mr. Barber:

This letter is in response to your correspondence received 07/22/21 regarding the above-mentioned rate filings. The responses to questions 8 and 9 are provided below.

8. On page 6 of Exhibit 8, MVP states that in each of the past five years, recoveries for its Vermont membership accounted for less than 1% of total claim adjustments resulting from SIU actions. Please specify the actual percentages for each of the past five years and explain why these results are "in line with expectations" when, as the response acknowledges, approximately 7% of members are now from Vermont.

Response: The majority of issues reviewed by the SIU are escalated through the fraud hotline and internal referrals. VT members (as well as NY) are made aware of how to refer potential SIU issues to MVP through a variety of MVP communications. As MVP NY membership consists of approximately 93% of all members, referrals to SIU are statistically dominated by New York membership which then leads to SIU conducting investigations into these issues (and others). Independent from member referrals, the SIU also identifies investigations by conducting data mining through use of fraud software, this method identifies cases from an issue or scheme perspective. Other sources of investigations come from MVP's participation with anti-fraud industry partners such as the National Health Care Anti-Fraud Association (NHCAA) and the Health Care Fraud Prevention Partnership (HFPP). These organizations notify healthcare payors of emerging fraud schemes as well as other providers that are under investigation by regulators and/or law enforcement.

The percent of claims recovered from SIU actions, which were attributed to Vermont membership, totaled .5%, .7%, 2.4%, .2% & .2% in each of the last 5 years.

9. Is MVP's SIU delivering a positive return on investment for Vermont ratepayers?

Response: The SIU has become increasingly active over the last 5 years, opening more cases than the year prior, each year since 2016. Overall Return on Investment (ROI) for MVP membership has been positive when viewing recoveries and more so when taking savings and cost prevention into consideration. Operating strictly from a pay and chase model can be time consuming, inefficient and often does not result in a recoupment of each dollar which was overpaid.



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For this reason, the SIU has become more proactive in making recommendations for MVP process improvements based on investigative findings, which have shown an increase in cost prevention for all members over the last 3 years. The impact of the process changes implemented from these SIU recommendations have benefited all MVP members.

If you have any questions, please contact me at mlombardo@mvphealthcare.com.

Sincerely,

A handwritten signature in black ink that reads "Matthew Lombardo".

Matthew Lombardo, FSA, MAAA
Senior Leader, Actuarial Services
MVP Health Care, Inc.