

October 25, 2024

Attn: Jody Sanders  
900 Cottage Grove Road  
Bloomfield, CT 06152

Re: Cigna Health and Life Insurance Company  
SERFF Tracking #: CCGP-134244586  
2025 Large Group Rate Filing

Dear Jody:

Lewis & Ellis, LLC (L&E) has been retained by the Vermont Green Mountain Care Board (GMCB) to review the above referenced filing. Upon review of the submitted filing documentation, the following additional information is needed.

1. Regarding the response to question #2 from the prior objection letter – Please elaborate further on how the average, minimum, and maximum rate change were determined. For example, the prior filed actuarial memorandum stated these were “calculated by comparing the current filed and approved manuals using an illustrative effective date of 1/1/2023 to the proposed 1/1/2024 manuals for a representative sample of Vermont sitused business”. Is this methodology still applicable for this filing, using data that are one year later?
2. The response to question #3 from the prior objection letter states that the targeted MLR for 2025 is 89.3%. The act memo states that the MLR is 88.0%, and that is consistent with the sum of the retention components. Please explain whether the MLR is 89.3% or 88.0%.
3. Regarding the response to question #8 from the prior objection letter –
  - a. Please confirm that the comment regarding observed historical utilization/mix trend that reads “National employer segment allowed claims trend, excluding new business” is meant to say, ‘utilization trend’ rather than ‘allowed claims trend’ (where ‘allowed claims trend’ would traditionally include unit cost trend).
  - b. Please explain why the national utilization/mix trend was used as a basis for the development of the utilization trend assumption for this filing, instead of VT-specific trends.
4. Regarding “VT 2025 Supplemental Exhibits” –
  - a. The “Historical Medical Trends” tab provides the normalization factors for medical and Rx historical claims, combined. Please also provide the normalization factors for medical and Rx claims separately, for each year.
  - b. In the “Historical Medical Trends” tab, please provide the member months that correspond to the ‘member per month’ provided in cells G6:G32.

We appreciate responses as expeditiously as possible to every objection in our letter, but no later than November 1, 2024.

Sincerely,

Allison Young, ASA, MAAA  
Vice President & Consulting Actuary  
Lewis & Ellis, LLC  
ayoung@lewisellis.com