

STATE OF VERMONT
GREEN MOUNTAIN CARE BOARD

In re: MVP Health Plan, Inc.) GMCB-004-23rr
2024 Individual Market Rate Filing)
SERFF No. MVPH-133660955

In re: MVP Health Plan, Inc.) GMCB-005-23rr
2024 Small Group Market Rate Filing)
SERFF No. MVPH-133660956

HCA SUGGESTED QUESTIONS FOR MVP HEALTH PLAN, INC.

The Office of the Health Care Advocate (HCA) suggests the following questions to the Green Mountain Care Board (GMCB) to pose to MVP Health Plan, Inc (MVP).

1. Please demonstrate the impact of “known contract changes” for 2023 and 2024 reflected in the Rx unit cost trends for these filings. Ind. Actuarial Mem. at 5; SG Actuarial Mem. at 5.
2. In responses to HCA Questions 3 and 4 dated June 27, 2022, in the dockets GMCB-005-22rr and 006-22rr, MVP stated that its contract with its current pharmacy benefit manager (PBM) runs through December 31, 2023. MVP also stated that its PBM contract has “annual market check provisions” that enable MVP to survey the market and negotiate contract enhancements. Please detail the outcome of any MVP “market check” MVP performed on its PBM in the last 12 months.
3. Please demonstrate the impact of any contract enhancements that MVP negotiated with its PBM in the last 12 months for the Vermont individual and small group books of business.
4. Please detail how MVP determined its PBM’s compliance with Vermont Act 131 (2022) and detail the impact of compliance on the proposed rates.
5. On page 35 of its January 15, 2023, report regarding PBMs,¹ the Department of Financial Regulation stated that, “read in a light most favorable to patients, the statutory language [of Act 131] suggests that Vermont health plans must apply copay assistance to patient deductibles.” For policies subject to these rate filings, state whether MVP applies copay assistance to member deductibles.
6. Please document the impact, if any, of allowing copay assistance to apply to member deductibles on these filings.

¹ <https://legislature.vermont.gov/assets/Legislative-Reports/DFR-Act-131-Report-on-PBMs.pdf>

7. We note MVP's current RBC ratio is well above the level that would trigger regulatory action. Please provide additional support for the claim that 1.5% CTR is required in these filings to maintain "statutory reserve requirement." Ind. Actuarial Mem. at 5; SG Actuarial Mem. at 8.
8. Describe MVP's negotiations with hospitals subject to GMCB regulation for FY2023. MVP's answer should identify any savings off the GMCB approved rates and quantify the impact of these savings on medical cost trend in these rate filings.
9. MVP selected the upper end of the range (\$130 ingredient, \$40 administration) for both ingredient cost and administration of the Covid vaccine, resulting in a \$2.29 PMPM Ind and \$2.32 PMPM SG charge. What would the PMPM be if the low end of the range (\$110 ingredient, \$25 administration) were selected?
10. Provide support for the increase in administrative costs from \$47.10 to \$52.74 PMPM Ind. and \$38.75 to \$44.62 PMPM SG.
11. Please quantify the impact of MVP's Quality Improvement/Cost Control programs, estimated cost of which is 6% to 7% of administrative expense. Ind. Actuarial Mem. at 8; SG Actuarial Mem. at 8.
12. In 2021, MVP showed an approximately \$40 million investment in Hudson Health Plan, Inc. on its Annual Statement. Please state where the return on this investment is reflected on MVP's 2022 Annual Statement.
13. Recalculate the pricing actuarial values for on-exchange Silver plans, then recalculate the on-exchange Silver rates and rate increases, using the following assumptions. Assume that 75% of current on-exchange base Silver enrollees shift to other plans, 50% of Silver 73 CSR enrollees shift to other plans, and that 25% of Silver 77 CSR enrollees shift to other plans. Further assume that these enrollees will move to another metal level in proportion with current enrollment in Gold, Reflective Silver, and Bronze plans.

Dated in Montpelier, Vermont, this 8th day of June 2023.

/s/ Charles Becker
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CERTIFICATE OF SERVICE

I, Eric Schultheis, hereby certify that I have served the above HCA Suggested Questions for MVP Health Plan, Inc. on Michael Barber, Laura Beliveau, Jennifer DaPolito, and Geoffrey Battista of the Green Mountain Care Board; and Gary Karnedy, Ryan Long and Maggie Kushner, Primmer Piper Eggleston & Cramer PC, representatives of MVP Health Care in the above-captioned matters, by electronic mail, delivery receipt requested, this 8th day of June, 2023.

/s/ Eric Schultheis

Eric Schultheis

Staff Attorney

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