

June 13, 2023

Christopher Pontiff  
MVP Health Plan, Inc.  
625 State Street  
Schenectady, NY 12305

Re: MVP Health Plan, Inc.  
2024 Vermont Exchange Rate Filing – Individual  
SERFF Tracking #: MVPH-133660955  
Objection #5

Dear Mr. Pontiff:

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 #2 in objection letter 3: If the changes to Exhibit 2a decrease the rate change to 12.58% within the pricing file, but there are no changes to the URRT, the URRT will still indicate the rate changes of 12.76% and the two will not match. As a result of the initial changes, anything else within the pricing file or URRT be affected, such as leveraging or the paid-to-allowed ratio in the pricing file or the AV/CS in Wksh 2 of the URRT? The two files will need to show the same rate change. Please reconcile.
2. MVP assumes that the cost of the COVID-19 vaccine in 2024 will be \$130, which is the high end of the \$110 to \$130 range from the KFF publication referenced in the actuarial memorandum. Please further explain the choice to assume a \$130 cost per vaccine, instead of, for example, the midpoint of \$120.
3. Please provide the number of COVID-19 treatments and visits, separately, for each month from January 2021 through May 2023 (or the most recent month available).
4. A recent study by NORC at the University of Chicago (<https://www.ahip.org/resources/medicaid-redetermination-coverage-transitions>) estimated that 8.1% of those losing Medicaid coverage in VT will purchase an individual plan. Of that 8.1%, 2.6% will be direct purchase, 4.2% will be subsidized marketplace, and 1.3% will be unsubsidized marketplace. Please further justify MVP's choice to assume no membership shift, specifically into Silver and Silver CSR plans, as a result of the Medicaid redeterminations, while taking this study into consideration.

5. Please explain why MVP is not assuming any membership shift into Bronze plans as a result of the new CSR guidance for 2024.
6. Please explain why MVP expects no members to see value in moving from a Silver CSR plan to the lowest Gold plan as result of the new CSR guidance for 2024.

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 20, 2023.

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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