

STATE OF VERMONT  
GREEN MOUNTAIN CARE BOARD

In re: MVP Health Plan, Inc. )  
2024 Small Group and Individual Group ) DOCKET NOS. GMCB-004-23rr  
Vermont Health Connect Rate Filing ) GMCB-005-23rr  
)  
SERFF Nos. MVPH-133660955 )  
MVPH-133660956 )

**MVP’S JULY 10, 2023 SUPPLEMENTAL PREFILED TESTIMONY OF  
CHRISTOPHER PONTIFF RE NOTICE OF DISAGREEMENT**

1 **Q1: Please state your name and employer for the record.**

2 A1: Christopher Pontiff, I work for MVP Health Plan, Inc.

3

4 **Q2: What is your position at MVP?**

5 A2: Senior Director, Commercial Pricing, Network and Trend Actuary.

6

7 **Q3: Please refer to page 16 of Lewis & Ellis’s July 5, 2023 Small Group Actuarial**  
8 **Memorandum, and the three recommendation bullets on those pages, and indicate**  
9 **whether MVP agrees or disagrees with the recommendations?**

10 A3: As to Bullet #1, MVP will comment on any updated hospital budget information as  
11 requested, and at the July 17th hearing.

12 As to Bullet #2, MVP agrees with L&E’s recommendation and that the updated  
13 risk adjustment would result in a 0.4% decrease in the Small Group filing.

14 As to Bullet #3, agrees with L&E’s recommendation and that the corrected and/or  
15 updated paid-to-allowed ratios result in a 0.2% decrease in the Small Group filing.

1 **Q4: Please refer to page 19 of Lewis & Ellis's July 5, 2023 Individual Actuarial**  
2 **Memorandum, and the four recommendation bullets on those pages, and indicate**  
3 **whether MVP agrees or disagrees with the recommendations?**

4 A4: As to Bullet #1, MVP will comment on any updated hospital budget information as  
5 requested, and at the July 17th hearing.

6 As to Bullet #2, MVP agrees with L&E's recommendation however, MVP  
7 calculates that L&E's recommendation would result in a 1.2% decrease in the Individual  
8 filing, not the 1.3% decrease calculated by L&E.

9 As to Bullet #3, MVP disagrees with the recommendation of enrollment shifts and  
10 additional silver plan CSR loads. There was not enough support for a material membership  
11 shift in response to the silver plans getting a higher-than-average rate increase. In addition,  
12 MVP does not have support for a material membership shift due to Medicaid  
13 Redetermination. We do not know how many of these members will be CSR eligible or at  
14 which CSR level and believe that member behavior is not always rational.

15 MVP believes that our CSR load was reasonable, appropriate, and within the  
16 guidance issued by the Board. MVP's membership movement assumption was determined  
17 based on the resulting premium relativities and historical migration of silver members.  
18 These assumptions are based in data, best reflect our expectation of the future, and are  
19 actuarially justified. Membership shifts should not be standardized across the rate review  
20 process, as each assumption should be evaluated independently.

21 L&E's recommendation results in a 0.3% increase for the Individual filing.

22 As to Bullet #4, agrees with L&E's recommendation and that the corrected and/or  
23 updated paid-to-allowed ratios result in a 0.2% decrease in the Individual filing.

1           **Q5: In light of MVP's acceptance of L&E's recommendation for Bullet #2**  
2           **(Updated Risk Adjustment Transfers) and Bullet #3 (Updated Paid-to-Allowed**  
3           **Ratios) in L&E's July 5, 2023 Small Group Actuarial Memorandum, and L&E's**  
4           **Bullet #2 (Updated Risk Adjustment Transfers) and Bullet #4 (Updated Paid-to-**  
5           **Allowed Ratios) in L&E's July 5, 2023 Individual Actuarial Memorandum what is**  
6           **the average rate increase MVP now requests for its Small Group and Individual**  
7           **Filings?**

8           A5: MVP's requested average rate increase for the Individual filing of 12.8% is reduced  
9           by 1.4%, for a modified total average rate increase request of 11.2% by MVP. MVP's  
10          requested average rate increase for the Small Group filing of 12.5% is reduced by 0.6%,  
11          for a modified total average rate increase request of 11.8% by MVP.

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**CERTIFICATE OF SERVICE**

I, Ryan M. Long, hereby certify that I have served a copy of *MVP's Supplemental Prefiled Testimony of Christopher Pontiff RE Notice of Disagreement* via e-mail upon the following:

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Dated: July 10, 2023

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