



January 12, 2021

Maria Mahmood, Compliance Specialist  
Cigna Health and Life Insurance Company  
900 Cottage Grove Road  
Bloomfield, CT 06002

Re: Cigna Health and Life Insurance Company  
Company NAIC # 67369; FEIN # 59-1031071  
VT - Cigna LG COVID-10 Premium Credit Filing  
SERFF Tracking # CCGP-132641757

Dear Maria:

Lewis & Ellis, Inc (L&E) has been retained by the Green Mountain Care Board ("GMCB") to review the above referenced Large Group product filing submitted on 12/22/2020. We thank you for filing a premium credit in Vermont, as the first company file such a credit in the state. Upon review of the actuarial memorandum and related information submitted, the following additional information is needed:

1. Will a target loss ratio determine the level of the final credit percentage? If so, what is the target loss ratio.
2. The Actuarial Memorandum states, "Due to the uncertainty surrounding the key cost drivers pertaining to COVID-19, the impact to calendar year 2020 claims cannot be properly assessed at this time. Following conclusion of the 2020 calendar year, the effect of the COVID-19 pandemic on the overall experience of the block of business will be assessed." Considering we are past the conclusion of the 2020 calendar year, when does the Company expect to be able to assess the 2020 experience well enough to determine a final credit percentage?
3. As we assess the reasonableness of this filing, we are struggling to approve this filing as filed due to the lack of having a final credit percentage and/or a defined formula and timeline for determining the final credit percentage. Can the Company provide a final credit percentage at this time? If not, please provide further information regarding the process that will be followed to determine the final credit percentage?
4. Response 6 states, "A large group's own experience will not directly impact the amount of the credit received. A large group's own experience will be part of the

national book of business experience that determines the experience rate credit percentage.” Please address the following regarding this statement:

- a. Since national experience will be used to determine the credit percentage, will the credit be given nationwide?
  - b. If so, will the nationwide credit be given as a uniform credit percentage, or will the credit vary by state?
  - c. Did the company consider using only Vermont experience to determine the Vermont policyholder credit percentage?
5. Given the most recent data available, what is the estimated ultimate 2020 MLR, prior to applying the experience rate credit, for VT? And Nationwide?

Please respond as soon as possible, but no later than January 19, 2021.

Our review of filing will be placed in suspense pending your response. Contact me if you have any questions.

Sincerely,



Traci Hughes, ASA, MAAA  
Vice President & Consulting Actuary



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