

September 26, 2022

Attn: Maria Mahmood  
900 Cottage Grove Road  
Hartford, CT 06152-1233

Re: Cigna Health and Life Insurance Company  
SERFF Tracking #: CCGP-133388045  
2022 Large Group Rate Filing

Dear Maria:

Lewis & Ellis, Inc. (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 list of changes for this filing compared to the 2020 approved filing, please provide the following:
  - a. Detailed explanation of the changes in methodology for Utilization Dampening, Non-Par, and Network Utilization. Please confirm these are the only methodology changes, and all other changes to the rate manual are quantitative (e.g., factor updates). Otherwise, provide detailed explanation of the methodology changes for those not listed in this question.
  - b. Comparison of the rating components that changed by +/-10% or more, and include detailed explanation for such change.
2. Regarding the Comparison to Status Quo table on page 3 of the act memo, please provide the following:
  - a. Breakdown of the "Revisions to Pricing Factors" line item, showing the impact of each rating factor change and how they equate to the combined average, minimum, and maximum percentages shown.
  - b. Breakdown of the "Expense Changes" line item, showing the impact/changes for each of the retention components. Further, please explain the reason for these changes.
  - c. Please confirm that the 7.5% listed as 'Filed and Approved Claims Trend' does not equate to the previously approved trend of 6.5%, but rather is the proposed trend rate for 2023+. If not, please reconcile.
3. Please provide a comparison of the medical, Rx, and combined trends in this filing versus the previously approved filing, broken out by cost, utilization, and total trend components. Please provide both quantitative and qualitative support for the changes.

4. Please confirm and show that the base claim costs are the same as the previously approved filing, only adjusted for trend. Otherwise, demonstrate any adjustments made to the base experience for this filing, including adjustments for COVID-19.
5. Please confirm whether the Historical claims experience for Vermont provided in “VT 2023 Supplemental Exhibits.pdf” includes both medical and pharmacy experience, or medical only.
6. Please provide at least three years of historical actual-to-expected retention, separately for profit and all other retention components.
7. Please further explanation the reason for the variation in the requested rate change, -21.5% to 31.3%. Please provide an example calculation of the minimum and maximum rate change.
8. As shown in the “Rate Review Detail” in SERFF, the weighted average prior rate is \$711.07 PMPM. Please illustrate how this amount reconciles to the approved rate from the 2020 filing.
9. The State is gathering how much the commercial insurers contribute to the Blueprint program on a yearly basis. Will you please provide the aggregate dollar amount and corresponding PMPM amounts for your company for this program?

We appreciate responses as expeditiously as possible to every objection in our letter, but no later than October 3, 2022.

Sincerely,

Allison Young, ASA, MAAA  
Consulting Actuary  
Lewis & Ellis, Inc.  
ayoung@lewisellis.com