



LEWIS & ELLIS

Actuaries and Consultants

700 Central Expressway South  
Suite 550  
Allen, TX 75013

972-850-0850  
lewisellis.com

June 22, 2022

Christopher Pontiff  
MVP Health Insurance Company  
625 State Street  
Schenectady, NY 12305

Re: MVP Health Plan, Inc.  
2023 Vermont Exchange Rate Filing – Small Group  
SERFF Tracking #: MVPH-133238198  
Objection #6

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 #15 of objection #2 – What are the factors contributing to the need for a normalization factor and would some of them be better represented in the URRT under the allowed trend or the plan design factor, etc.? Please elaborate further on the components of the normalization factor and explain why it is best represented in the URRT as part of the ‘Other Factor’ or propose and alternate URRT representation.

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 29, 2022.

We trust that you understand these forms may not be used in Vermont until they are formally approved by the GMCB.

Sincerely,

*Traci Hughes*

Traci Hughes, FSA, MAAA  
Vice President & Consulting Actuary  
Lewis & Ellis, Inc.  
thughes@LewisEllis.com  
(972)-850-0850