

STATE OF VERMONT
GREEN MOUNTAIN CARE BOARD

In re: MVP Health Plan, Inc.)	
2023 Small Group and Individual Group)	DOCKET NOS. GMCB-005-22rr
Vermont Health Connect Rate Filing)	GMCB-006-22rr
)	
SERFF Nos. MVPH-133238186)	
MVPH-133238198)	

**ADDENDUM TO MVP’S POST-HEARING PROPOSED FINDINGS
OF FACT AND CONCLUSIONS OF LAW**

MVP Health Plan, Inc., (“MVP”) by and through Primmer Piper Eggleston & Cramer PC, submits this Addendum to MVP’s July 28, 2022 Proposed Findings of Fact and Conclusions of Law in response to Lewis & Ellis, Inc. (“L&E”)’s, July 29, 2022, report to the Board (“URRT Report”).

Addendum

The Board should be consistent in setting any hospital budget figure in this rate review and the hospital budgets hearings (including any mid-year adjustments to hospital budgets). If the Board chooses to use the information in the URRT Report, MVP requests that any cut to MVP’s proposed rates based on hospital budgets be consistent with, and no greater than, the actual hospital budget cuts the Board will order later this year.

L&E has identified eleven reasons why the data in the URRT Report may not be reliable evidence for the Board. *URRT Report, pp. 1-2.*

Among other things: (1) “[t]here is inconsistent oversight between states, that impact the accuracy of the data reported on the URRT.”; (2) “[t]he reporting periods include 2020 and 2021, which were heavily impacted by the COVID-19 pandemic. In order to properly rate using these time periods, pricing methodologies may have been altered by carriers, which made PY2022 different or uniquely difficult for URRT reporting.”; and, (3) “[i]t is not clear if all URRTs were

updated after the rate review to account for any changes that occurred during the process.” MVP shares L&E’s concerns with the “limitations” on the CCIO information. In addition, the comparison to other states may be too variable to add evidentiary value. Vermont’s statutory process is very unique, and trends vary widely nationwide and by state.

The Board should exercise its discretion consistently in this docket and the later hospital budget hearings, to prevent inadequate rates.

Dated: August 1, 2022

PRIMMER PIPER EGGLESTON & CRAMER PC

By: /s/ Gary F. Karnedy
Gary F. Karnedy, Esq.
Ryan M. Long, Esq.
Alice M. McDermott, Esq.
30 Main Street, Suite 500
P.O. Box 1489
Burlington, VT 05402-1489
(802) 864-0880
gkarnedy@primmer.com
rlong@primmer.com
amcdermott@primmer.com

Attorneys for MVP Health Plan, Inc