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[mvphealthcare.com](http://mvphealthcare.com)

February 26, 2021

Ms. Traci Hughes, ASA, MAAA  
Lewis & Ellis, Inc.  
700 Central Expressway South, Suite 550  
Allen, TX 75013

Re: : MVP Health Plan, Inc.  
Company NAIC # 95521; FEIN # 14-1640868  
2021 Large Group POS Rider Rate Filing  
SERFF Tracking # MVPH-132718695

Dear Ms. Hughes:

This letter is in response to your correspondence received 02/23/21 regarding the above-mentioned rate filing. The responses to your questions are provided below.

1. Please provide quantitative support for the development of the average rate change of -3.4%. Support should be in Excel format with working formulas.

Response: Please see the attached excel document that shows the development of the -3.4% rate change.

2. Please provide further quantitative and qualitative support for the development of the additional percentage of premium for the POS riders (i.e. what base data was used, what trend assumptions were used, what adjustments were made, etc.).

Response: MVP does not have a credible block in VT with OON benefits. As a result, MVP used its NY LG OON block of over 17,000 members to determine the average OON utilization as a percentage of INN utilization and compute the average OON load. MVP then used its benefit relativity model to determine the relativity of OON benefits to one another normalized back to the OON % utilization in the NY block.

If you have any questions or require any additional information, please contact me at [cpontiff@mvphealthcare.com](mailto:cpontiff@mvphealthcare.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Pontiff".

Chris Pontiff, ASA  
Leader, Actuarial, Commercial  
MVP Health Care

				Rider % of Premium		2.8%		
Coplan	Rider	Contract Type	Subscribers	2020 Base Premium	2020 Rider Premium	2021 Base Premium	2021 Rider Premium	
VT3H43EXLBE	SV3H03L	Double	1	\$1,012.81	\$27.98	\$978.80	\$27.04	
VT3H43EXLBE	SV3H03L	Single	4	\$2,025.62	\$55.95	\$1,957.59	\$54.07	
<b>Total</b>				\$3,038.43	\$83.93	\$2,936.39	\$81.11	
							<b>Rider Rate Change</b>	<b>-3.4%</b>