

State: Virginia
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only
 - HMO
Product Name: OHP Small Group 2021 Q2 Rate Filing
Project Name/Number: /

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Reviewer Note [Opinion Letter - Small Group - 132576121.pdf](#)

State: Virginia
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO
Product Name: OHP Small Group 2021 Q2 Rate Filing
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Filing at a Glance

Company:	Optima Health Plan
Product Name:	OHP Small Group 2021 Q2 Rate Filing
State:	Virginia
TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)
Sub-TOI:	HOrg02G.004F Small Group Only - HMO
Filing Type:	Rate
Date Submitted:	12/01/2020
SERFF Tr Num:	OPHL-132576121
SERFF Status:	Closed-Approved
State Tr Num:	OPHL-132576121
State Status:	Approved
Co Tr Num:	
Effective	04/01/2021
Date Requested:	
Author(s):	Noel Wharton, Dean Ratzlaff, Graham Sutherlin, Mitchell Stevens, Rebecca Palasek, James Juillerat
Reviewer(s):	Bill Dismore (primary), David Shea
Disposition Date:	01/28/2021
Disposition Status:	Approved
Effective Date:	04/01/2021

State: Virginia
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO
Product Name: OHP Small Group 2021 Q2 Rate Filing
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Filing Company: Optima Health Plan

General Information

Project Name: Status of Filing in Domicile:
Project Number: Date Approved in Domicile:
Requested Filing Mode: Review & Approval Domicile Status Comments:
Explanation for Combination/Other: Market Type: Group
Submission Type: New Submission Group Market Size: Small
Group Market Type: Employer Overall Rate Impact:
Filing Status Changed: 01/28/2021
State Status Changed: 02/01/2021 Deemer Date: 01/27/2021
Created By: Mitchell Stevens Submitted By: Mitchell Stevens
Corresponding Filing Tracking Number:
State TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO) State Sub-TOI: HOrg02G.004F Small Group Only - HMO
PPACA: Non-Grandfathered Immed Mkt Reforms
PPACA Notes: null
Exchange Intentions: There will be no SHOP plans

Filing Description:

This rate filing is for small group medical ACA-compliant products which will be sold off exchange effective April 1, 2021.
Corresponding form filing: SERFF Tracking # OPHL-132312297
Corresponding binder filing: SERFF Tracking # OPHL-VA21-125097860
Most recent rate filing: SERFF Tracking # OPHL-132131820

Company and Contact

Filing Contact Information

Noel Wharton, Compliance Manager nmwharto@sentara.com
Optima Health 757-552-8910 [Phone]
4417 Corporation Lane 757-552-7116 [FAX]
Virginia Beach, VA 23462

Filing Company Information

Optima Health Plan	CoCode: 95281	State of Domicile: Virginia
4417 Corporation Lane	Group Code:	Company Type: HMO
Virginia Beach, VA 23462	Group Name:	State ID Number:
(757) 552-8910 ext. [Phone]	FEIN Number: 54-1283337	

State:	Virginia	Filing Company:	Optima Health Plan
TOI/Sub-TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO		
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Filing Fees

State Fees

Fee Required? No

Retaliatory? No

Fee Explanation:

State:	Virginia	Filing Company:	Optima Health Plan
TOI/Sub-TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO		
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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Bill Dismore	01/28/2021	01/28/2021

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Info has been requested from company	Bill Dismore	01/20/2021	01/20/2021
Info has been requested from company	Bill Dismore	01/07/2021	01/07/2021
Info has been requested from company	Bill Dismore	12/23/2020	12/23/2020

Response Letters

Responded By	Created On	Date Submitted
Mitchell Stevens	01/22/2021	01/22/2021
Graham Sutherlin	01/11/2021	01/11/2021
Mitchell Stevens	12/28/2020	12/28/2020

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Actuarial Review - Summary & Opinion Report	Reviewer Note	Bill Dismore	02/01/2021	

State:	Virginia	Filing Company:	Optima Health Plan
TOI/Sub-TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO		
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Disposition

Disposition Date: 01/28/2021

Effective Date: 04/01/2021

Status: Approved

HHS Status: HHS Approved

State Review: Reviewed by Actuary

Comment:

Company Name:	Company Rate Change:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
Optima Health Plan	Increase	0.400%	0.400%	\$910,513	20,965	\$221,144,293	8.300%	-14.300%

Percent Change Approved:

Minimum: -14.300%

Maximum: 8.300%

Weighted Average: 0.400%

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Product Checklist	Received & Acknowledged	Yes
Supporting Document (revised)	Part III Actuarial Memorandum and Certifications	Received & Acknowledged	Yes
Supporting Document	L&H Actuarial Memorandum	Received & Acknowledged	Yes
Supporting Document	Part II - Consumer Justification Narrative	Received & Acknowledged	Yes
Supporting Document (revised)	Health Insurance Rate Request Summary	Received & Acknowledged	Yes
Supporting Document (revised)	Unified Rate Review Template	Received & Acknowledged	Yes
Supporting Document	VA ACA Rate Filing Template	Received & Acknowledged	Yes
Supporting Document	Data Reliance Letter	Received & Acknowledged	Yes
Supporting Document (revised)	Plan Submission Letter	Received & Acknowledged	Yes
Supporting Document	Actuarial Value calculator screenshots	Received & Acknowledged	Yes
Supporting Document	Unique Plan Designs	Received & Acknowledged	Yes

State:	Virginia	Filing Company:	Optima Health Plan
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Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Objection 20201223 Response	Received & Acknowledged	Yes
Supporting Document	Objection 20210107 Response	Received & Acknowledged	Yes
Supporting Document	Objection 20210120 Response	Received & Acknowledged	Yes
Rate (revised)	OHP SG Rate Sheet	Approved	Yes

State: Virginia
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Filing Company: Optima Health Plan

Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	01/20/2021
Submitted Date	01/20/2021
Respond By Date	02/19/2021

Dear Noel Wharton,

Introduction:

One or more items included within the submission were found to be in non-conformity with statutory, regulatory or administrative requirements as set forth below.

Objection 1

- Objection 20210107 Response (Supporting Document)

Comments: 1. [Follow up to 2] Please respond to the following questions regarding the risk adjustment transfer estimate:

- a. Please provide the projected AV and IDF for 2021 that reflects the projected 2021 metal mix.
- b. Please provide a revised risk adjustment transfer calculation using the ARF, AV, and IDF that aligns with the projected 2021 distributions. Additionally, please update the pricing and associated documents (i.e., URRT) to reflect the revised risk adjustment transfer calculation that aligns with the projected 2021 distributions.

Conclusion:

We shall be glad to reconsider this submission upon receipt of the requested information to address the objections noted above. Should you need clarification of any of the information contained in this letter, please contact the undersigned.

A response to this objection (or request for information if more applicable) is expected within 30 days. After 30 days, the filing will be DISAPPROVED unless a 30-day extension is requested.

Once a submission has been closed, a new SERFF submission will be required. To expedite the review, the new submission should reference the SERFF tracking number of the prior submission and verify that all outstanding issues have been addressed.

Should you wish to discuss any of the objections or provide additional information related to any of the objections, this should be done prior to making a new SERFF submission.

Thank you for your courtesy and consideration in this matter.

Sincerely,
Bill Dismore

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Filing Company: Optima Health Plan

Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	01/07/2021
Submitted Date	01/07/2021
Respond By Date	01/22/2021

Dear Noel Wharton,

Introduction:

The Bureau has reviewed this filing and has the following concerns. A further review will be performed once these concerns are addressed.

Please note, any revisions, modifications or changes of any type to this filing not specifically requested by us must be brought to our attention upon resubmission and explained in detail.

Please respond as soon as possible, but no later than the "Respond by" Date above.

Objection 1

- Objection 20201223 Response (Supporting Document)

Comments: 1. [Follow up to 2a] Please provide qualitative and quantitative support to show that adjusting the allowed PMPM values using risk adjustment (on a paid basis) does not skew the trend results. This support should include historical paid-to-allowed ratios for the experience underlying the trend, an explanation of how the risk adjustment PMPMs were allocated between medical and pharmacy claims, an explanation of how the risk adjustment PMPMs were allocated to the experience periods used to develop trend (i.e., not calendar years), and any other support that can be provided.

2. [Follow up to 4] Please respond to the following questions regarding the risk adjustment transfer estimate:

a. Please explain why it is not necessary to adjust the ARF, AV, and IDF for the projected changes in demographic and metal mix.

b. Please explain why the following values differ between the OHIC filing relative to the OHP filing, given they represent state-wide estimates:

i. Projected 2021 statewide average premium

ii. 2020 Market PLRS and 2021 Market PLRS

iii. 2020-2021 Model Weight Change

iv. 2021 Projected Factors incl. risk score

v. 2021 Projected Factors excl. risk score

3. [Follow up to 5] The projected federal MLR for the rates effective 4/1/2021 is 88%, per the actuarial memorandum. Please provide additional support to show it is necessary to revise the profit margin from 2.01% (for rates effective 1/1/2021) to 1.08% (for rates effective 4/1/2021) for purposes of maintaining a loss ratio above the federal MLR requirement of 80%.

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Conclusion:

We shall be glad to continue our review of this submission upon receipt of the requested information or resolution of the issues described above. Upon subsequent review, other concerns may require attention.

A response to this request for information is requested as soon as possible. Failure to respond may result in the filing becoming DISAPPROVED. An extension may be requested in advance of the "Respond by" date. Please do not hesitate to contact me if there are any questions.

Sincerely,
Bill Dismore

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Objection Letter

Objection Letter Status	Info has been requested from company
Objection Letter Date	12/23/2020
Submitted Date	12/23/2020
Respond By Date	01/06/2021

Dear Noel Wharton,

Introduction:

The Bureau has reviewed this filing and has the following concerns. A further review will be performed once these concerns are addressed.

Please note, any revisions, modifications or changes of any type to this filing not specifically requested by us must be brought to our attention upon resubmission and explained in detail.

Please respond as soon as possible, but no later than the "Respond by" Date above.

Objection 1

- L&H Actuarial Memorandum (Supporting Document)

Comments: Please respond to the following questions regarding the adjustment made to account for the impact of COVID-19 within the experience period:

a. Please provide a numerical development of the 1.47% adjustment factor used to account for reduced utilization in the experience period during March 2020, due to COVID-19. Please provide utilization data for January through August of 2019 and 2020 that demonstrates March was the only impacted month.

Objection 2

- L&H Actuarial Memorandum (Supporting Document)

Comments: The Actuarial Memorandum indicates that trends were developed based on a combination of OHP small group experience, Millimans HCGs, and general industry knowledge regarding recent trends in inflation. We have the following requests regarding the trend applied in the development of the rates.

a. Please provide quantitative support for the trend assumptions ultimately used in rate development. This should be shown separately for medical and pharmacy trends.

b. Please provide a demonstration of the allowed trend experienced in the small group population. Please demonstrate how the monthly claims experience used was normalized for changes in demographic mix, morbidity, geographic mix, provider network mix, etc.

c. Please provide the trend produced using Millimans HCGs and indicate how it was determined that Millimans HCGs represent a reasonable basis for trend development given differences in provider contracts between the data underlying the development of the HCGs and anticipated changes in OHPs provider contracts between 2019, 2020, and 2021.

Objection 3

- L&H Actuarial Memorandum (Supporting Document)

Comments: Please respond to the following questions regarding the risk adjustment transfer estimate and provide support in Excel documents with working formulas:

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a. Please provide a numerical development of the projected risk adjustment transfer amount, including each of the components of the risk transfer calculation such as the PLRS and ARF.

b. Please provide support for the assumption used to project the statewide average premium change between the base and projection periods.

Objection 4

- L&H Actuarial Memorandum (Supporting Document)

Comments: Please respond to the following questions regarding the geographic rating area factors:

a. Please explain how the historical OHP small group data was normalized for metal and demographic mix given the PLRS is impacted by these factors (in other words, the PLRS represents more than just morbidity).

b. Please provide the numerical development of the regional rating factors.

Objection 5

- L&H Actuarial Memorandum (Supporting Document)

Comments: Please provide support for the change in profit and risk load relative to the rate filing effective 1/1/2021. Please include a detailed description of the analysis that was used to determine the final margin of 1.08% (e.g., RBC) and the considerations taken into account.

Conclusion:

We shall be glad to continue our review of this submission upon receipt of the requested information or resolution of the issues described above. Upon subsequent review, other concerns may require attention.

A response to this request for information is requested as soon as possible. Failure to respond may result in the filing becoming DISAPPROVED. An extension may be requested in advance of the "Respond by" date. Please do not hesitate to contact me if there are any questions.

Sincerely,
Bill Dismore

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Response Letter

Response Letter Status	Submitted to State
Response Letter Date	01/22/2021
Submitted Date	01/22/2021

Dear Bill Dismore,

Introduction:

Response 1

Comments:

A response letter along with a set of new rate filing documents have been submitted to supporting documents. A post submission updated has also been submitted with these updates.

Related Objection 1

Applies To:

- Objection 20210107 Response (Supporting Document)

Comments: 1. [Follow up to 2] Please respond to the following questions regarding the risk adjustment transfer estimate:

a. Please provide the projected AV and IDF for 2021 that reflects the projected 2021 metal mix.

b. Please provide a revised risk adjustment transfer calculation using the ARF, AV, and IDF that aligns with the projected 2021 distributions. Additionally, please update the pricing and associated documents (i.e., URRT) to reflect the revised risk adjustment transfer calculation that aligns with the projected 2021 distributions.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Part III Actuarial Memorandum and Certifications
Comments:	
Attachment(s):	SG_OHP_2021Q2_Act_Memo_Attachments_OHP_20210121.xlsx SG_OHP_2021Q2_Act_Memo_OHP_20210121.pdf SG_OHP_2021Q2_Act_Memo_OHP_Redline_20210121.pdf

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Supporting Document Schedule Item Changes	
Satisfied - Item:	Part III Actuarial Memorandum and Certifications
Comments:	
Attachment(s):	SG_OHP_2021Q2_Act_Memo_Attachments_OHP_20210121.xlsx SG_OHP_2021Q2_Act_Memo_OHP_20210121.pdf SG_OHP_2021Q2_Act_Memo_OHP_Redline_20210121.pdf
Satisfied - Item:	Health Insurance Rate Request Summary
Comments:	
Attachment(s):	SG_OHP_2021Q2_Health_Insurance_Rate_Request_Summary_Part_I_20210121.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	Part III Actuarial Memorandum and Certifications
Comments:	
Attachment(s):	SG_OHP_2021Q2_Act_Memo_Attachments_OHP_20210121.xlsx SG_OHP_2021Q2_Act_Memo_OHP_20210121.pdf SG_OHP_2021Q2_Act_Memo_OHP_Redline_20210121.pdf
Satisfied - Item:	Health Insurance Rate Request Summary
Comments:	
Attachment(s):	SG_OHP_2021Q2_Health_Insurance_Rate_Request_Summary_Part_I_20210121.pdf
Satisfied - Item:	Unified Rate Review Template
Comments:	
Attachment(s):	SG_OHP_2021Q2_URRT_20210121.pdf SG_OHP_2021Q2_URRT_20210121.xlsm SG_OHP_2021Q2_URRT_20210121.xml

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Supporting Document Schedule Item Changes	
Satisfied - Item:	Part III Actuarial Memorandum and Certifications
Comments:	
Attachment(s):	SG_OHP_2021Q2_Act_Memo_Attachments_OHP_20210121.xlsx SG_OHP_2021Q2_Act_Memo_OHP_20210121.pdf SG_OHP_2021Q2_Act_Memo_OHP_Redline_20210121.pdf
Satisfied - Item:	Health Insurance Rate Request Summary
Comments:	
Attachment(s):	SG_OHP_2021Q2_Health_Insurance_Rate_Request_Summary_Part_I_20210121.pdf
Satisfied - Item:	Unified Rate Review Template
Comments:	
Attachment(s):	SG_OHP_2021Q2_URRT_20210121.pdf SG_OHP_2021Q2_URRT_20210121.xlsm SG_OHP_2021Q2_URRT_20210121.xml
Satisfied - Item:	Plan Submission Letter
Comments:	The Actuarial Transmittal letter is attached along with Form filing transmittal letter.
Attachment(s):	SG_OHP_2021_Form_Transmittal_Letter_20200522.pdf SG_OHP_2021Q2_Actuarial_Transmittal_Letter_20210121.pdf

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Supporting Document Schedule Item Changes	
Satisfied - Item:	Part III Actuarial Memorandum and Certifications
Comments:	
Attachment(s):	SG_OHP_2021Q2_Act_Memo_Attachments_OHP_20210121.xlsx SG_OHP_2021Q2_Act_Memo_OHP_20210121.pdf SG_OHP_2021Q2_Act_Memo_OHP_Redline_20210121.pdf
Satisfied - Item:	Health Insurance Rate Request Summary
Comments:	
Attachment(s):	SG_OHP_2021Q2_Health_Insurance_Rate_Request_Summary_Part_I_20210121.pdf
Satisfied - Item:	Unified Rate Review Template
Comments:	
Attachment(s):	SG_OHP_2021Q2_URRT_20210121.pdf SG_OHP_2021Q2_URRT_20210121.xlsm SG_OHP_2021Q2_URRT_20210121.xml
Satisfied - Item:	Plan Submission Letter
Comments:	The Actuarial Transmittal letter is attached along with Form filing transmittal letter.
Attachment(s):	SG_OHP_2021_Form_Transmittal_Letter_20200522.pdf SG_OHP_2021Q2_Actuarial_Transmittal_Letter_20210121.pdf
Satisfied - Item:	Objection 20210120 Response
Comments:	
Attachment(s):	SG_OHP_2021Q2_20210120_Response_Letter_for_OPHL_20210121.pdf

No Form Schedule items changed.

SERFF Tracking #:

OPHL-132576121

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Company Tracking #:

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Virginia

Filing Company:

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TOI/Sub-TOI:

HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO

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Rate/Rule Schedule Item Changes

Item No.	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments	Date Submitted
1	OHP SG Rate Sheet	HMO085.D.21.SGOFF, HMO001.D.21.SGOFF, HMO008.D.21.SGOFF, HMO003.D.21.SGOFF, HMO004.D.21.SGOFF, HMO016.D.21.SGOFF, HMO010.D.21.SGOFF, HMO018.D.21.SGOFF, HMO012.D.21.SGOFF, HMO014.D.21.SGOFF, HMO080.D.21.SGOFF, HMO019.D.21.SGOFF, HMO020.D.21.SGOFF, HMO086.D.21.SGOFF, HMO081.D.21.SGOFF, HMO051.D.21.SGOFF, HMO079.D.21.SGOFF, HMO065.D.21.SGOFF, HMO068.D.21.SGOFF, HMO069.D.21.SGOFF, HMO067.D.21.SGOFF, HMO070.D.21.SGOFF, HMO071.D.21.SGOFF, POS076.D.21.SGOFF, POS074.D.21.SGOFF, POS051.D.21.SGOFF, POS052.D.21.SGOFF, POS080.D.21.SGOFF, POS054.D.21.SGOFF, POS077.D.21.SGOFF, POS081.D.21.SGOFF, POS061.D.21.SGOFF, POS059.D.21.SGOFF, POS078.D.21.SGOFF, POS063.D.21.SGOFF, POS065.D.21.SGOFF, POS055.D.21.SGOFF, POS058.D.21.SGOFF, POS079.D.21.SGOFF, HMO138.161.171.181.	Revised	Previous State Filing Number: OPHL-132131820 Percent Rate Change Request: 0.4	SG_OHP_2021Q2_VA _Rate_Sheet_2021012 1.pdf,	01/22/2021 By: Mitchell Stevens

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Project Name/Number:	/		

Rate/Rule Schedule Item Changes						
		S.21.SGOFF, HMO139.162.172.182. S.21.SGOFF, HMO141.163.173.183. S.21.SGOFF, HMO144.164.174.184. S.21.SGOFF, HMO147.165.175.185. S.21.SGOFF, HMO149.166.176.186. S.21.SGOFF, HMO151.167.177.187. S.21.SGOFF, HMO152.168.178.188. S.21.SGOFF, HMO157.170.179.189. S.21.SGOFF, HMO159.169.180.190. S.21.SGOFF				

Conclusion:

Sincerely,
Mitchell Stevens

State:	Virginia	Filing Company:	Optima Health Plan
TOI/Sub-TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO		
Product Name:	OHP Small Group 2021 Q2 Rate Filing		
Project Name/Number:	/		

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	01/11/2021
Submitted Date	01/11/2021

Dear Bill Dismore,

Introduction:

Please see included response

Response 1

Comments:

Please see included response

Related Objection 1

Applies To:

- Objection 20201223 Response (Supporting Document)

State:	Virginia	Filing Company:	Optima Health Plan
TOI/Sub-TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO		
Product Name:	OHP Small Group 2021 Q2 Rate Filing		
Project Name/Number:	/		

Comments: 1. [Follow up to 2a] Please provide qualitative and quantitative support to show that adjusting the allowed PMPM values using risk adjustment (on a paid basis) does not skew the trend results. This support should include historical paid-to-allowed ratios for the experience underlying the trend, an explanation of how the risk adjustment PMPMs were allocated between medical and pharmacy claims, an explanation of how the risk adjustment PMPMs were allocated to the experience periods used to develop trend (i.e., not calendar years), and any other support that can be provided.

2. [Follow up to 4] Please respond to the following questions regarding the risk adjustment transfer estimate:

a. Please explain why it is not necessary to adjust the ARF, AV, and IDF for the projected changes in demographic and metal mix.

b. Please explain why the following values differ between the OHIC filing relative to the OHP filing, given they represent state-wide estimates:

i. Projected 2021 statewide average premium

ii. 2020 Market PLRS and 2021 Market PLRS

iii. 2020-2021 Model Weight Change

iv. 2021 Projected Factors incl. risk score

v. 2021 Projected Factors excl. risk score

3. [Follow up to 5] The projected federal MLR for the rates effective 4/1/2021 is 88%, per the actuarial memorandum. Please provide additional support to show it is necessary to revise the profit margin from 2.01% (for rates effective 1/1/2021) to 1.08% (for rates effective 4/1/2021) for purposes of maintaining a loss ratio above the federal MLR requirement of 80%.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Objection 20210107 Response
Comments:	
Attachment(s):	20210107 OHP Objection Response.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

State:	Virginia	Filing Company:	Optima Health Plan
TOI/Sub-TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO		
Product Name:	OHP Small Group 2021 Q2 Rate Filing		
Project Name/Number:	/		

Conclusion:

Thank you,
Graham R. Sutherlin
Sincerely,
Graham Sutherlin

State:	Virginia	Filing Company:	Optima Health Plan
TOI/Sub-TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO		
Product Name:	OHP Small Group 2021 Q2 Rate Filing		
Project Name/Number:	/		

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	12/28/2020
Submitted Date	12/28/2020

Dear Bill Dismore,

Introduction:

Response 1

Comments:

A response has been submitted to supporting documentation.

Related Objection 1

Applies To:

- L&H Actuarial Memorandum (Supporting Document)

Comments: Please respond to the following questions regarding the adjustment made to account for the impact of COVID-19 within the experience period:

a. Please provide a numerical development of the 1.47% adjustment factor used to account for reduced utilization in the experience period during March 2020, due to COVID-19. Please provide utilization data for January through August of 2019 and 2020 that demonstrates March was the only impacted month.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Objection 20201223 Response
Comments:	
Attachment(s):	20201223 OHP Objection Response - Redacted.xlsx 20201223_OHP_Objection_Response_20201228.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Response 2

Comments:

A response has been submitted to supporting documentation.

SERFF Tracking #:

OPHL-132576121

State Tracking #:

OPHL-132576121

Company Tracking #:

State:

Virginia

Filing Company:

Optima Health Plan

TOI/Sub-TOI:

HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO

Product Name:

OHP Small Group 2021 Q2 Rate Filing

Project Name/Number:

/

Related Objection 2

Applies To:

- L&H Actuarial Memorandum (Supporting Document)

Comments: The Actuarial Memorandum indicates that trends were developed based on a combination of OHP small group experience, Millimans HCGs, and general industry knowledge regarding recent trends in inflation. We have the following requests regarding the trend applied in the development of the rates.

a. Please provide quantitative support for the trend assumptions ultimately used in rate development. This should be shown separately for medical and pharmacy trends.

b. Please provide a demonstration of the allowed trend experienced in the small group population. Please demonstrate how the monthly claims experience used was normalized for changes in demographic mix, morbidity, geographic mix, provider network mix, etc.

c. Please provide the trend produced using Millimans HCGs and indicate how it was determined that Millimans HCGs represent a reasonable basis for trend development given differences in provider contracts between the data underlying the development of the HCGs and anticipated changes in OHPs provider contracts between 2019, 2020, and 2021.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Objection 20201223 Response
Comments:	
Attachment(s):	20201223 OHP Objection Response - Redacted.xlsx 20201223_OHP_Objection_Response_20201228.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Response 3**Comments:**

A response has been submitted to supporting documentation.

Related Objection 3

Applies To:

- L&H Actuarial Memorandum (Supporting Document)

State:	Virginia	Filing Company:	Optima Health Plan
TOI/Sub-TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO		
Product Name:	OHP Small Group 2021 Q2 Rate Filing		
Project Name/Number:	/		

Comments: Please respond to the following questions regarding the risk adjustment transfer estimate and provide support in Excel documents with working formulas:

a. Please provide a numerical development of the projected risk adjustment transfer amount, including each of the components of the risk transfer calculation such as the PLRS and ARF.

b. Please provide support for the assumption used to project the statewide average premium change between the base and projection periods.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Objection 20201223 Response
Comments:	
Attachment(s):	20201223 OHP Objection Response - Redacted.xlsx 20201223_OHP_Objection_Response_20201228.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Response 4

Comments:

A response has been submitted to supporting documentation.

Related Objection 4

Applies To:

- L&H Actuarial Memorandum (Supporting Document)

Comments: Please respond to the following questions regarding the geographic rating area factors:

a. Please explain how the historical OHP small group data was normalized for metal and demographic mix given the PLRS is impacted by these factors (in other words, the PLRS represents more than just morbidity).

b. Please provide the numerical development of the regional rating factors.

Changed Items:

State:	Virginia	Filing Company:	Optima Health Plan
TOI/Sub-TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO		
Product Name:	OHP Small Group 2021 Q2 Rate Filing		
Project Name/Number:	/		

Supporting Document Schedule Item Changes	
Satisfied - Item:	Objection 20201223 Response
Comments:	
Attachment(s):	20201223 OHP Objection Response - Redacted.xlsx 20201223_OHP_Objection_Response_20201228.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Response 5

Comments:

A response has been submitted to supporting documentation.

Related Objection 5

Applies To:

- L&H Actuarial Memorandum (Supporting Document)

Comments: Please provide support for the change in profit and risk load relative to the rate filing effective 1/1/2021. Please include a detailed description of the analysis that was used to determine the final margin of 1.08% (e.g., RBC) and the considerations taken into account.

Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	Objection 20201223 Response
Comments:	
Attachment(s):	20201223 OHP Objection Response - Redacted.xlsx 20201223_OHP_Objection_Response_20201228.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Sincerely,
Mitchell Stevens

State: Virginia
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only
- HMO
Product Name: OHP Small Group 2021 Q2 Rate Filing
Project Name/Number: /

Reviewer Note

Created By:

Bill Dismore on 02/01/2021 07:15 AM

Last Edited By:

Bill Dismore

Submitted On:

02/01/2021 07:16 AM

Subject:

Actuarial Review - Summary & Opinion Report

Comments:

1/30/2021 - received summary and opinion report attached.

State:	Virginia	Filing Company:	Optima Health Plan
TOI/Sub-TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO		
Product Name:	OHP Small Group 2021 Q2 Rate Filing		
Project Name/Number:	/		

Attachment Opinion Letter - Small Group - 132576121.pdf could not be reproduced here for the following reason: PDF header signature not found.

State: Virginia
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO
Product Name: OHP Small Group 2021 Q2 Rate Filing
Project Name/Number: /

Filing Company: Optima Health Plan

Post Submission Update Request Processed On 01/22/2021

Status: Allowed
Created By: Mitchell Stevens
Processed By: Bill Dismore
Comments:

General Information:

Field Name	Requested Change	Prior Value
Overall Rate Impact	0.4	-0.54

Company Rate Information:

Company Name: Optima Health Plan

Field Name	Requested Change	Prior Value
Overall % Indicated Change	0.400%	-0.540%
Overall % Rate Impact	0.400%	-0.540%
Written Premium Change for this Program	\$910513	\$-1185728
Maximum %Change (where required)	8.300%	7.300%
Minimum %Change (where required)	-14.300%	-15.100%
Product:	NEW	
Product Name	OHP Small Group 2021 Q2 ACA Rate Filing	
HIOS Product ID	20507	
HIOS Submission ID	20507	
Number of Covered Lives	33228	

REQUESTED RATE CHANGE INFORMATION:

Min:	-14.300	-15.100
Max:	8.300	7.3
Weighted Avg.:	0.400	-0.54

REQUESTED RATE:

Projected Earned Premium:	215,128,212.000	213,093,951.000
Min:	201.880	199.970
Max:	1,623.220	1,607.900
Weighted Avg.:	539.530	534.420

State:	Virginia	Filing Company:	Optima Health Plan
TOI/Sub-TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO		
Product Name:	OHP Small Group 2021 Q2 Rate Filing		
Project Name/Number:	/		

Rate Information

Rate data applies to filing.

Filing Method:	Electronic
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	10.000%
Effective Date of Last Rate Revision:	04/01/2020
Filing Method of Last Filing:	Electroinc
SERFF Tracking Number of Last Filing:	OPHL-132131820

Company Rate Information

Company Name:	Company Rate Change:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
Optima Health Plan	Increase	0.400%	0.400%	\$910,513	20,965	\$221,144,293	8.300%	-14.300%

State: Virginia
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO
Filing Company: Optima Health Plan
Product Name: OHP Small Group 2021 Q2 Rate Filing
Project Name/Number: /

Rate Review Detail

COMPANY:

Company Name: Optima Health Plan
 HHS Issuer Id: 20507

PRODUCTS:

Product Name	HIOS Product ID	HIOS Submission ID	Number of Covered Lives
OHP Small Group 2021 Q2 ACA Rate Filing	20507	20507	33228

Trend Factors: 7.27

FORMS:

New Policy Forms:

Affected Forms:

Other Affected Forms: HMO085.D.21.SGOFF,HMO001.D.21.SGOFF,HMO008.D.21.SGOFF,HMO003.D.21.SGOFF,HMO004.D.21.SGOFF,HMO016.D.21.SGOFF,HMO010.D.21.SGOFF,HMO018.D.21.SGOFF,HMO012.D.21.SGOFF,HMO014.D.21.SGOFF,HMO080.D.21.SGOFF,HMO019.D.21.SGOFF,HMO020.D.21.SGOFF,HMO086.D.21.SGOFF,HMO081.D.21.SGOFF,HMO051.D.21.SGOFF,HMO079.D.21.SGOFF,HMO065.D.21.SGOFF,HMO068.D.21.SGOFF,HMO069.D.21.SGOFF,HMO067.D.21.SGOFF,HMO070.D.21.SGOFF,HMO071.D.21.SGOFF,POS076.D.21.SGOFF,POS074.D.21.SGOFF,POS051.D.21.SGOFF,POS052.D.21.SGOFF,POS080.D.21.SGOFF,POS054.D.21.SGOFF,POS077.D.21.SGOFF,POS081.D.21.SGOFF,POS061.D.21.SGOFF,POS059.D.21.SGOFF,POS078.D.21.SGOFF,POS063.D.21.SGOFF,POS065.D.21.SGOFF,POS055.D.21.SGOFF,POS058.D.21.SGOFF,POS079.D.21.SGOFF,HMO138.161.171.181.S.21.SGOFF,HMO139.162.172.182.S.21.SGOFF,HMO141.163.173.183.S.21.SGOFF,HMO144.164.174.184.S.21.SGOFF,HMO147.165.175.185.S.21.SGOFF,HMO149.166.176.186.S.21.SGOFF,HMO151.167.177.187.S.21.SGOFF,HMO152.168.178.188.S.21.SGOFF,HMO157.170.179.189.S.21.SGOFF,HMO159.169.180.190.S.21.SGOFF,HMO138.161.171.181.S.21.SGOFF,HMO139.162.172.182.S.21.SGOFF,HMO141.163.173.183.S.21.SGOFF,HMO144.164.174.184.S.21.SGOFF,HMO147.165.175.185.S.21.SGOFF,HMO149.166.176.186.S.21.SGOFF,HMO151.167.177.187.S.21.SGOFF,HMO152.168.178.188.S.21.SGOFF,HMO157.170.179.189.S.21.SGOFF,HMO159.169.180.190.S.21.SGOFF

REQUESTED RATE CHANGE INFORMATION:

Change Period: Annual
 Member Months: 398,736
 Benefit Change: None
 Percent Change Requested: Min: -14.3 Max: 8.3 Avg: 0.4

PRIOR RATE:

Total Earned Premium: 297,051,681.00
 Total Incurred Claims: 245,436,922.00
 Annual \$: Min: 188.79 Max: 1,794.84 Avg: 548.52

State: Virginia **Filing Company:** Optima Health Plan
TOI/Sub-TOI: HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only
- HMO
Product Name: OHP Small Group 2021 Q2 Rate Filing
Project Name/Number: /

REQUESTED RATE:

Projected Earned Premium:	215,128,212.00
Projected Incurred Claims:	188,669,000.00
Annual \$:	Min: 201.88 Max: 1,623.22 Avg: 539.53

SERFF Tracking #:	OPHL-132576121	State Tracking #:	OPHL-132576121	Company Tracking #:	
State:	Virginia	Filing Company:	Optima Health Plan		
TOI/Sub-TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO				
Product Name:	OHP Small Group 2021 Q2 Rate Filing				
Project Name/Number:	/				

Rate/Rule Schedule

SERFF Tracking #:

OPHL-132576121

State Tracking #:

OPHL-132576121

Company Tracking #:

State:

Virginia

Filing Company:

Optima Health Plan

TOI/Sub-TOI:

HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO

Product Name:

OHP Small Group 2021 Q2 Rate Filing

Project Name/Number:

/

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		OHP SG Rate Sheet	HMO085.D.21.SGOFF, HMO001.D.21.SGOFF, HMO008.D.21.SGOFF, HMO003.D.21.SGOFF, HMO004.D.21.SGOFF, HMO016.D.21.SGOFF, HMO010.D.21.SGOFF, HMO018.D.21.SGOFF, HMO012.D.21.SGOFF, HMO014.D.21.SGOFF, HMO080.D.21.SGOFF, HMO019.D.21.SGOFF, HMO020.D.21.SGOFF, HMO086.D.21.SGOFF, HMO081.D.21.SGOFF, HMO051.D.21.SGOFF, HMO079.D.21.SGOFF, HMO065.D.21.SGOFF, HMO068.D.21.SGOFF, HMO069.D.21.SGOFF, HMO067.D.21.SGOFF, HMO070.D.21.SGOFF, HMO071.D.21.SGOFF, POS076.D.21.SGOFF, POS074.D.21.SGOFF, POS051.D.21.SGOFF, POS052.D.21.SGOFF, POS080.D.21.SGOFF, POS054.D.21.SGOFF, POS077.D.21.SGOFF, POS081.D.21.SGOFF, POS061.D.21.SGOFF, POS059.D.21.SGOFF, POS078.D.21.SGOFF, POS063.D.21.SGOFF, POS065.D.21.SGOFF, POS055.D.21.SGOFF, POS058.D.21.SGOFF, POS079.D.21.SGOFF, HMO138.161.171.181.S.21.SG OFF, HMO139.162.172.182.S.21.SG	Revised	Previous State Filing Number: OPHL-132131820 Percent Rate Change Request: 0.4	SG_OHP_2021Q2_VA _Rate_Sheet_2021012 1.pdf,

State:	Virginia	Filing Company:	Optima Health Plan
TOI/Sub-TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO		
Product Name:	OHP Small Group 2021 Q2 Rate Filing		
Project Name/Number:	/		

			OFF, HMO141.163.173.183.S.21.SG OFF, HMO144.164.174.184.S.21.SG OFF, HMO147.165.175.185.S.21.SG OFF, HMO149.166.176.186.S.21.SG OFF, HMO151.167.177.187.S.21.SG OFF, HMO152.168.178.188.S.21.SG OFF, HMO157.170.179.189.S.21.SG OFF, HMO159.169.180.190.S.21.SG OFF			
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State:	Virginia	Filing Company:	Optima Health Plan
TOI/Sub-TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO		
Product Name:	OHP Small Group 2021 Q2 Rate Filing		
Project Name/Number:	/		

Supporting Document Schedules

Satisfied - Item:	Product Checklist
Comments:	
Attachment(s):	SG_OHP_2021Q2_VA_Rate_Review_Checklist_20201130.pdf
Item Status:	Received & Acknowledged
Status Date:	01/28/2021

Satisfied - Item:	Part III Actuarial Memorandum and Certifications
Comments:	
Attachment(s):	SG_OHP_2021Q2_Act_Memo_Attachments_OHP_20210121.xlsx SG_OHP_2021Q2_Act_Memo_OHP_20210121.pdf SG_OHP_2021Q2_Act_Memo_OHP_Redline_20210121.pdf
Item Status:	Received & Acknowledged
Status Date:	01/28/2021

Satisfied - Item:	L&H Actuarial Memorandum
Comments:	Required information may be found in the memo filed under Part III Actuarial Memorandum and Certifications.
Attachment(s):	
Item Status:	Received & Acknowledged
Status Date:	01/28/2021

Satisfied - Item:	Part II - Consumer Justification Narrative
Comments:	No current increase of at least 15%.
Attachment(s):	
Item Status:	Received & Acknowledged
Status Date:	01/28/2021

Satisfied - Item:	Health Insurance Rate Request Summary
Comments:	
Attachment(s):	SG_OHP_2021Q2_Health_Insurance_Rate_Request_Summary_Part_I_20210121.pdf
Item Status:	Received & Acknowledged
Status Date:	01/28/2021

Satisfied - Item:	Unified Rate Review Template
Comments:	

State:	Virginia	Filing Company:	Optima Health Plan
TOI/Sub-TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO		
Product Name:	OHP Small Group 2021 Q2 Rate Filing		
Project Name/Number:	/		

Attachment(s):	SG_OHP_2021Q2_URRT_20210121.pdf SG_OHP_2021Q2_URRT_20210121.xlsm SG_OHP_2021Q2_URRT_20210121.xml
Item Status:	Received & Acknowledged
Status Date:	01/28/2021
Satisfied - Item:	VA ACA Rate Filing Template
Comments:	Not required for quarterly filings.
Attachment(s):	
Item Status:	Received & Acknowledged
Status Date:	01/28/2021
Satisfied - Item:	Data Reliance Letter
Comments:	The data reliance letter is attached.
Attachment(s):	SG_OHP_2021Q2_Reliance Letter_20201130.pdf
Item Status:	Received & Acknowledged
Status Date:	01/28/2021
Satisfied - Item:	Plan Submission Letter
Comments:	The Actuarial Transmittal letter is attached along with Form filing transmittal letter.
Attachment(s):	SG_OHP_2021_Form_Transmittal_Letter_20200522.pdf SG_OHP_2021Q2_Actuarial_Transmittal_Letter_20210121.pdf
Item Status:	Received & Acknowledged
Status Date:	01/28/2021
Satisfied - Item:	Actuarial Value calculator screenshots
Comments:	Attached are AV screenshots.
Attachment(s):	SG_OHP_2021_Direct_HMO_20200522.pdf SG_OHP_2021_Direct_POS_20200522.pdf SG_OHP_2021_Select_CH_20200522.pdf SG_OHP_2021_Select_RICH_20200522.pdf
Item Status:	Received & Acknowledged
Status Date:	01/28/2021
Satisfied - Item:	Unique Plan Designs
Comments:	Attached are Unique Plan Design forms.

State:	Virginia	Filing Company:	Optima Health Plan
TOI/Sub-TOI:	HOrg02G Group Health Organizations - Health Maintenance (HMO)/HOrg02G.004F Small Group Only - HMO		
Product Name:	OHP Small Group 2021 Q2 Rate Filing		
Project Name/Number:	/		

Attachment(s):	SG_OHP_2021_Unique_Plan_Justification_20507VA125_1_20200522.pdf SG_OHP_2021_Unique_Plan_Justification_20507VA125_2_20200522.pdf SG_OHP_2021_Unique_Plan_Justification_20507VA125_3_20200522.pdf SG_OHP_2021_Unique_Plan_Justification_20507VA128_1_20200522.pdf SG_OHP_2021_Unique_Plan_Justification_20507VA128_2_20200522.pdf
Item Status:	Received & Acknowledged
Status Date:	01/28/2021
Satisfied - Item:	Objection 20201223 Response
Comments:	
Attachment(s):	20201223 OHP Objection Response - Redacted.xlsx 20201223_OHP_Objection_Response_20201228.pdf
Item Status:	Received & Acknowledged
Status Date:	01/28/2021
Satisfied - Item:	Objection 20210107 Response
Comments:	
Attachment(s):	20210107 OHP Objection Response.pdf
Item Status:	Received & Acknowledged
Status Date:	01/28/2021
Satisfied - Item:	Objection 20210120 Response
Comments:	
Attachment(s):	SG_OHP_2021Q2_20210120_Response_Letter_for_OPHL_20210121.pdf
Item Status:	Received & Acknowledged
Status Date:	01/28/2021