

State: Virginia

Filing Company: Group Hospitalization and Medical Services, Inc.

TOI/Sub-TOI: H16I Individual Health - Major Medical/H16I.005A Individual - Preferred Provider (PPO)

Product Name: VA GHMSI GF CD 2021 Amendment

Project Name/Number: VA GHMSI GF CD 2021 Amendment/VA/CF/GF/DB/2021 AMEND (1/21)

## Table of Contents

### User Usage Agreement

#### Attachments

Usage Agreement

[Usage Agreement.pdf](#)

### Form Attachments

(ex. Form Name      Form Number      Attachment Name)

2021 Amendment

VA/CF/GF/DB/2021

AMEND (1/21)

[VA-CF-GF-DB-2021 AMEND \(1-21\) FINAL.pdf](#)

### Supporting Document

(ex. Supporting Document Name      Attachment Name)

#### Attachments

Certification of

Compliance/Readability

[GHMSI COMP CERT.pdf](#)

L&amp;H Readability - Health

[VA CF GF DB Comp Cert - GHMSI 2021 Amend.pdf](#)

Submission Letter

[GHMSI AMEND LTR.pdf](#)

Explanation of Variations

[VA-CF-GF-DB-2021 AMEND \(1-21\) eov.pdf](#)

Response letter dated 12-10-20

[Response letter 12-10-20.pdf](#)Original approved Evidence of  
Coverage and previously approved  
amendments used to update it[VA GHMSI GF CD Approval 12-12-19.pdf](#)Original approved Evidence of  
Coverage and previously approved  
amendments used to update it[VA-CF-BP-DB-IEA \(7-08\) Approval 5-13-09.pdf](#)Original approved Evidence of  
Coverage and previously approved  
amendments used to update it[VA-CF-BP-DB IEA 7-08.pdf](#)Original approved Evidence of  
Coverage and previously approved  
amendments used to update it[VA-CF-GF-DB-2020 AMEND \(1-20\).pdf](#)

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## Filing at a Glance

Company: Group Hospitalization and Medical Services, Inc.  
Product Name: VA GHMSI GF CD 2021 Amendment  
State: Virginia  
TOI: H16I Individual Health - Major Medical  
Sub-TOI: H16I.005A Individual - Preferred Provider (PPO)  
Filing Type: Form  
Date Submitted: 10/20/2020  
SERFF Tr Num: CFBC-132570626  
SERFF Status: Closed-Approved  
State Tr Num:  
State Status: Approved  
Co Tr Num: VA/CF/GF/DB/2021 AMEND (1/21)  
  
Effective: On Approval  
Date Requested:  
Author(s): Laurie Thurtle, Kimberly Taylor  
Reviewer(s): Edward Whyte (primary)  
Disposition Date: 02/03/2021  
Disposition Status: Approved  
Effective Date:

**State:** Virginia  
**TOI/Sub-TOI:** H16I Individual Health - Major Medical/H16I.005A Individual - Preferred Provider (PPO)  
**Product Name:** VA GHMSI GF CD 2021 Amendment  
**Project Name/Number:** VA GHMSI GF CD 2021 Amendment/VA/CF/GF/DB/2021 AMEND (1/21)

## General Information

Project Name: VA GHMSI GF CD 2021 Amendment  
Project Number: VA/CF/GF/DB/2021 AMEND (1/21)  
Requested Filing Mode: Review & Approval  
Explanation for Combination/Other:  
Submission Type: New Submission  
Overall Rate Impact:

Status of Filing in Domicile:  
Date Approved in Domicile:  
Domicile Status Comments:  
Market Type: Individual  
Individual Market Type: Individual  
Filing Status Changed: 02/03/2021  
State Status Changed: 02/03/2021  
Created By: Laurie Thurtle  
Corresponding Filing Tracking Number:  
State TOI: H16I Individual Health - Major Medical

Deemer Date: 01/09/2021  
Submitted By: Laurie Thurtle

State Sub-TOI: H16I.005A Individual - Preferred Provider  
(PPO)

PPACA: Not PPACA-Related

PPACA Notes: null

Include Exchange Intentions:

No

Filing Description:

Attached for your review and approval are copies of the above-referenced forms in their final version. The primary purpose of this filing is to update our contracts for grandfathered products in the individual market issued by CareFirst. These forms will be used with the following form upon approval:

Form NumberState/SERFF Filing NumberApproval Date  
VA/CF/BP/DB/IEA (7/08)042/00773May 17, 2008

This form will be effective on January 1, 2021, or the date of the Bureau's approval of these forms, whichever occurs later. This form may be included on our website at [www.carefirst.com](http://www.carefirst.com). There is no rate impact associated with these forms.

Form Number VA/CF/GF/DB/2021 AMEND (1/21) has been created to update certain provisions within the Evidence of Coverage and Description of Covered Services that were previously approved by the Virginia Bureau of Insurance.

The compliance certification with the requirements of Title 38.2 of the Code of Virginia and the regulations promulgated pursuant thereto is attached to this submission. The Readability Compliance Certification has also been attached.

We appreciate your consideration of this matter and look forward to your acknowledgement and approval of these forms.

## Company and Contact

### Filing Contact Information

Laurie Thurtle, Senior Contract Specialist    [laurie.thurtle@carefirst.com](mailto:laurie.thurtle@carefirst.com)  
10455 Mill Run Circle    410-605-2425 [Phone]  
Owings Mills, MD 21157    410-308-8322 [FAX]

**SERFF Tracking #:** CFBC-132570626

**State Tracking #:**

**Company Tracking #:** VA/CF/GF/DB/2021 AMEND  
(1/21)

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**State:** Virginia **Filing Company:** Group Hospitalization and Medical Services, Inc.  
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### Filing Company Information

Group Hospitalization and Medical  
Services, Inc.  
840 First Street NE  
Washington, DC 20065  
(202) 479-8000 ext. [Phone]

CoCode: 53007  
Group Code:  
Group Name:  
FEIN Number: 53-0078070

State of Domicile: District of  
Columbia  
Company Type:  
State ID Number:

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**State:** Virginia **Filing Company:** Group Hospitalization and Medical Services, Inc.  
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## Filing Fees

### State Fees

Fee Required? No

Retaliatory? No

Fee Explanation:

State:	Virginia	Filing Company:	Group Hospitalization and Medical Services, Inc.
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## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Approved	Edward Whyte	02/03/2021	02/03/2021

## Objection Letters and Response Letters

### Objection Letters

Status	Created By	Created On	Date Submitted
Disapproved	Edward Whyte	11/20/2020	11/20/2020

### Response Letters

Responded By	Created On	Date Submitted
Laurie Thurtle	12/10/2020	12/10/2020

<b>State:</b>	Virginia	<b>Filing Company:</b>	Group Hospitalization and Medical Services, Inc.
<b>TOI/Sub-TOI:</b>	H16I Individual Health - Major Medical/H16I.005A Individual - Preferred Provider (PPO)		
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## Disposition

Disposition Date: 02/03/2021

Effective Date:

Status: Approved

HHS Status: Not Reported

State Review: Reviewed-No Actuary

Comment:

Rate data does NOT apply to filing.

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Certification of Compliance/Readability	Received & Acknowledged	Yes
Supporting Document	Product Checklist	Received & Acknowledged	Yes
Supporting Document (revised)	L&H Readability - Health	Received & Acknowledged	Yes
Supporting Document	L&H Readability - Health	Withdrawn	Yes
Supporting Document	Submission Letter	Received & Acknowledged	Yes
Supporting Document	Explanation of Variations	Received & Acknowledged	Yes
Supporting Document	Response letter dated 12-10-20	Received & Acknowledged	Yes
Supporting Document	Original approved Evidence of Coverage and previously approved amendments used to update it	Received & Acknowledged	Yes
Form	2021 Amendment	Approved	Yes

**State:** Virginia  
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## Objection Letter

Objection Letter Status	Disapproved
Objection Letter Date	11/20/2020
Submitted Date	11/20/2020
Respond By Date	12/20/2020

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Dear Laurie Thurtle,

**Introduction:**

The submission is *DISAPPROVED* and may not be used in the Commonwealth of Virginia.

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

### Objection 1

- L&H Readability - Health (Supporting Document)

Comments: The Flesch reading ease score for the submitted amendment is 43.3, rather than the regulatory required score of 50. However, a lower reading ease score may be allowed if the Plan requests an exception and identifies the specific reasons why the minimum standard was not met.

### Objection 2

- 2021 Amendment, VA/CF/GF/DB/2021 AMEND (1/21) (Form)

Comments: Under Supporting Documentation, please attach the originally approved Evidence of Coverage and all previously approved amendments that were used to update the approved Evidence of Coverage.

### Conclusion:

We shall be glad to reconsider this submission upon receipt of the revised forms 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 Letter 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,  
Edward Whyte



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Product Name:	VA GHMSI GF CD 2021 Amendment		
Project Name/Number:	VA GHMSI GF CD 2021 Amendment/VA/CF/GF/DB/2021 AMEND (1/21)		

## Response Letter

Response Letter Status	Submitted to State
Response Letter Date	12/10/2020
Submitted Date	12/10/2020

Dear Edward Whyte,

### Introduction:

### Response 1

#### Comments:

An updated Readability Certification has been added with a Flesch reading ease score of 50.2.

### Related Objection 1

Applies To:

- L&H Readability - Health (Supporting Document)

Comments: The Flesch reading ease score for the submitted amendment is 43.3, rather than the regulatory required score of 50. However, a lower reading ease score may be allowed if the Plan requests an exception and identifies the specific reasons why the minimum standard was not met.

### Changed Items:

Supporting Document Schedule Item Changes	
Satisfied - Item:	L&H Readability - Health
Comments:	
Attachment(s):	VA CF GF DB Comp Cert - GHMSI 2021 Amend.pdf
Previous Version	
Satisfied - Item:	L&H Readability - Health
Comments:	
Attachment(s):	VA Readability Certification - CD GF 2021 AMEND.pdf

<b>State:</b>	Virginia	<b>Filing Company:</b>	Group Hospitalization and Medical Services, Inc.
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<b>Product Name:</b>	VA GHMSI GF CD 2021 Amendment		
<b>Project Name/Number:</b>	VA GHMSI GF CD 2021 Amendment/VA/CF/GF/DB/2021 AMEND (1/21)		

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	L&H Readability - Health
<b>Comments:</b>	
<b>Attachment(s):</b>	VA CF GF DB Comp Cert - GHMSI 2021 Amend.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>L&amp;H Readability - Health</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>VA Readability Certification - CD GF 2021 AMEND.pdf</i>

<b>Satisfied - Item:</b>	Response letter dated 12-10-20
<b>Comments:</b>	
<b>Attachment(s):</b>	Response letter 12-10-20.pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

## Response 2

### Comments:

The documents have been added.

## Related Objection 2

Applies To:

- 2021 Amendment, VA/CF/GF/DB/2021 AMEND (1/21) (Form)

Comments: Under Supporting Documentation, please attach the originally approved Evidence of Coverage and all previously approved amendments that were used to update the approved Evidence of Coverage.

## Changed Items:

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Response letter dated 12-10-20
<b>Comments:</b>	
<b>Attachment(s):</b>	Response letter 12-10-20.pdf

State:	Virginia	Filing Company:	Group Hospitalization and Medical Services, Inc.
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Product Name:	VA GHMSI GF CD 2021 Amendment		
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Supporting Document Schedule Item Changes	
Satisfied - Item:	Response letter dated 12-10-20
Comments:	
Attachment(s):	Response letter 12-10-20.pdf
Satisfied - Item:	Original approved Evidence of Coverage and previously approved amendments used to update it
Comments:	
Attachment(s):	VA GHMSI GF CD Approval 12-12-19.pdf VA-CF-BP-DB-IEA (7-08) Approval 5-13-09.pdf VA-CF-BP-DB IEA 7-08.pdf VA-CF-GF-DB-2020 AMEND (1-20).pdf

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Sincerely,  
Laurie Thurtle

<b>State:</b>	Virginia	<b>Filing Company:</b>	Group Hospitalization and Medical Services, Inc.
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## Form Schedule

Lead Form Number: VA/CF/GF/DB/2021 AMEND (1/21)								
Item No.	Schedule Item Status	Form Name	Form Number	Form Type	Form Action	Action Specific Data	Readability Score	Attachments
1	Approved 02/03/2021	2021 Amendment	VA/CF/GF/DB/2021 AMEND (1/21)	CERA	Initial			VA-CF-GF-DB-2021 AMEND (1-21) FINAL.pdf

### Form Type Legend:

<b>ADV</b>	Advertising	<b>AEF</b>	Application/Enrollment Form
<b>CER</b>	Certificate	<b>CERA</b>	Certificate Amendment, Insert Page, Endorsement or Rider
<b>DDP</b>	Data/Declaration Pages	<b>FND</b>	Funding Agreement (Annuity, Individual and Group)
<b>MTX</b>	Matrix	<b>NAP</b>	Network Access Plan
<b>NOC</b>	Notice of Coverage	<b>OTH</b>	Other
<b>OUT</b>	Outline of Coverage	<b>PJK</b>	Policy Jacket
<b>POL</b>	Policy/Contract/Fraternal Certificate	<b>POLA</b>	Policy/Contract/Fraternal Certificate: Amendment, Insert Page, Endorsement or Rider
<b>PRC</b>	Provider Contract/Provider Addendum/Provider Leading Agreement	<b>PRD</b>	Provider Directory

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<b>Project Name/Number:</b>	VA GHMSI GF CD 2021 Amendment/VA/CF/GF/DB/2021 AMEND (1/21)		

## Supporting Document Schedules

<b>Satisfied - Item:</b>	Certification of Compliance/Readability
<b>Comments:</b>	
<b>Attachment(s):</b>	GHMSI COMP CERT.pdf
<b>Item Status:</b>	Received & Acknowledged
<b>Status Date:</b>	02/03/2021

<b>Bypassed - Item:</b>	Product Checklist
<b>Bypass Reason:</b>	This amendment will attach to a contract that is compliant with the product checklist
<b>Attachment(s):</b>	
<b>Item Status:</b>	Received & Acknowledged
<b>Status Date:</b>	02/03/2021

<b>Satisfied - Item:</b>	L&H Readability - Health
<b>Comments:</b>	
<b>Attachment(s):</b>	VA CF GF DB Comp Cert - GHMSI 2021 Amend.pdf
<b>Item Status:</b>	Received & Acknowledged
<b>Status Date:</b>	02/03/2021

<b>Satisfied - Item:</b>	Submission Letter
<b>Comments:</b>	
<b>Attachment(s):</b>	GHMSI AMEND LTR.pdf
<b>Item Status:</b>	Received & Acknowledged
<b>Status Date:</b>	02/03/2021

<b>Satisfied - Item:</b>	Explanation of Variations
<b>Comments:</b>	
<b>Attachment(s):</b>	VA-CF-GF-DB-2021 AMEND (1-21) eov.pdf
<b>Item Status:</b>	Received & Acknowledged
<b>Status Date:</b>	02/03/2021

<b>Satisfied - Item:</b>	Response letter dated 12-10-20
<b>Comments:</b>	
<b>Attachment(s):</b>	Response letter 12-10-20.pdf
<b>Item Status:</b>	Received & Acknowledged

<b>State:</b>	Virginia	<b>Filing Company:</b>	Group Hospitalization and Medical Services, Inc.
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<b>Status Date:</b>	02/03/2021
<b>Satisfied - Item:</b>	Original approved Evidence of Coverage and previously approved amendments used to update it
<b>Comments:</b>	
<b>Attachment(s):</b>	VA GHMSI GF CD Approval 12-12-19.pdf VA-CF-BP-DB-IEA (7-08) Approval 5-13-09.pdf VA-CF-BP-DB IEA 7-08.pdf VA-CF-GF-DB-2020 AMEND (1-20).pdf
<b>Item Status:</b>	Received & Acknowledged
<b>Status Date:</b>	02/03/2021

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## Superseded Schedule Items

Please note that all items on the following pages are items, which have been replaced by a newer version. The newest version is located with the appropriate schedule on previous pages. These items are in date order with most recent first.

Creation Date	Schedule Item Status	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
10/16/2020	Withdrawn 02/03/2021	Supporting Document	L&H Readability - Health	12/10/2020	VA Readability Certification - CD GF 2021 AMEND.pdf (Superceded)