August 16, 2019

Laura Shayder
PO Box 42702
626 8th Ave SE
Olympia, WA 98501

VIA EMAIL

RE: STATE OF WASHINGTON HEALTH CARE AUTHORITY REQUEST FOR PROPOSALS (RFP)
RFP NO. 3872

Dear Ms. Shayder:

We appreciate the opportunity to provide a response to RFP No. 3872.

Pursuant to section 2.9 of the RFP, we are respectfully submitting a complaint on the grounds that the lack of certain critical census information provides an unfair advantage to incumbents who possess this information for the population the incumbent serves. When this same information is not shared by all bidders, fair competition is unnecessarily restricted and regards the limited census information provided to date as insufficient to prepare an accurate response.

During the question and answer period which ended July 31, 2019, we indicated that the census file provided did not include critical pieces of information that help Medicare Advantage plans estimate CMS revenue to determine price and to confirm network adequacy to permit a carrier to offer a National Group Medicare Advantage PPO plan. Those data elements are:

- age or the date of birth
- gender
- zip code
- For every eligible retiree, spouse and dependent

The census provided in the addendum on August 9th does not provide the following critical information:

- age or date of birth
- gender
- zip code
- For every eligible retiree, spouse and dependent.

While not broken down by the individual prospective member, the data does include:

- four age brackets
- gender
- county
- for Washington only, not outside the state of Washington

Because only the incumbent carriers will have access to the critical census elements to accurately predict CMS revenue, we believe the RFP unnecessarily restricts competition, particularly for a Medicare Advantage Plan Sponsor who is responding to RFP No. 3872 with a National Group Medicare Advantage PPO plan.

The remedy we propose is as follows:

- Provide a census data file, in excel, that includes the following data elements for every eligible Medicare beneficiary, including retirees, spouses, dependent children and pre-65 Medicare-disabled participants:
    - For each individual, their age or date of birth
    - For each individual, their gender
    - For each individual, their zip code
    - For each individual, the plan in which they are enrolled today

- Further, we request that bidders be provided a two week extension (from the time the revised census is provided by Milliman) to permit bidders to finalize proposed rates and complete *RFP 3872-Exhibit K-1 – Cost and Plan Design*.

Thank you for your consideration.

Sincerely,