EXAMINATION REPORT of VIRGINIA PREMIER HEALTH PLAN, INC. Richmond, Virginia as of December 31, 2019

COMMONWEALTH OF VIRGINIA

SCOTT A. WHITE
COMMISSIONER OF INSURANCE
STATE CORPORATION COMMISSION
BUREAU OF INSURANCE

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I, Scott A. White, Commissioner of Insurance of the Commonwealth of Virginia, do hereby certify that the annexed copy of the Examination Report of Virginia Premier Health Plan, Inc. as of December 31, 2019, is a true copy of the original report on file with this Bureau.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed to the original the seal of the Bureau at the City of Richmond, Virginia this 20th day of November 2020

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Scott A. White Commissioner of Insurance



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Honorable Scott A. White Commissioner of Insurance Richmond, Virginia

Dear Sir:

Pursuant to your instructions and by the authority of Section 38.2-4315 of the Code of Virginia, an examination of the records and affairs of

VIRGINIA PREMIER HEALTH PLAN, INC.

Richmond, Virginia

hereinafter referred to as the Corporation, has been completed. The report thereon is submitted for your consideration.

SCOPE OF THE EXAMINATION

The last examination of the Corporation was made by representatives of the State Corporation Commission's (the "Commission") Bureau of Insurance (the "Bureau") as of December 31, 2016. The current examination covers the three-year period from January 1, 2017 through December 31, 2019.

This examination was conducted in accordance with the NAIC Financial Condition Examiners' Handbook (Handbook). The Handbook requires that the Bureau plan and perform the examination to evaluate the Corporation's financial condition, assess corporate governance, identify current and prospective risks of the Corporation and evaluate system controls and procedures used to mitigate those risks. An examination also includes identifying and evaluating significant risks that could cause an insurer's surplus to be materially misstated both currently and prospectively.

All accounts and activities of the Corporation were considered in accordance with the risk-focused examination process. This may include assessing significant estimates made by management and evaluating management's compliance with Statutory Accounting Principles. The examination does not attest to the fair presentation of the financial statements included herein.

This examination report includes significant findings of fact and general information about the insurer and its financial condition. There may be other items identified during the examination, that, due to their nature (e.g. subjective conclusions, proprietary information, etc.), are not included within the examination report but separately communicated to other regulators and/or the Corporation.

HISTORY

The Corporation was incorporated in the Commonwealth of Virginia on January 31, 1994 and became licensed in Virginia as a health maintenance organization ("HMO") pursuant to Chapter 43 of Title 38.2 of the Code of Virginia on August 2, 1995. The Corporation was organized as a wholly-owned subsidiary of PHP Healthcare Corporation ("PHP"). On January 31, 1996, PHP sold a 30% interest in the Corporation to University Health Services Managed Care, Inc. ("UHSMC"), an affiliate of the Virginia Commonwealth University Health System Authority ("VCUHSA"). On December 22, 1998, UHSMC purchased the remaining shares in the Corporation. On December 15, 2000, the Corporation changed its name from Virginia Chartered Health Plan, Inc. to Virginia Premier Health Plan, Inc.

Effective July 1, 2010, UHSMC and the Corporation merged with the Corporation remaining as the surviving entity. As part of this transaction, 1,000 shares of no par, common stock were issued to University Health Services, Inc. which, in turn, transferred the shares to VCUHSA. As a result, VCUHSA became the sole shareholder of the Corporation.

In August 2013, the Internal Revenue Service approved the Corporation's application for tax exempt status effective July 1, 2010.

CAPITAL AND SURPLUS

At December 31, 2019, the Corporation's capital and surplus was \$213,550,838. According to the restated Articles of Incorporation, the Corporation has the authority to issue 1,000 shares of no par, common stock. At December 31, 2019, 1,000 shares of common stock, with a total value of \$10,000, were issued and outstanding with gross paid in and contributed surplus of \$9,261,977, surplus notes of \$98,750,000 and unassigned funds (surplus) of \$105,528,861.

On June 1, 2014, VCUHSA issued a \$75,000,000 subordinated promissory note to the Corporation. Interest on the subordinated promissory note bears a rate between 4.67% and 4.88% per annum. On May 18, 2017, the Corporation repaid \$26,250,000 in principal and \$8,532,000 in interest to VCUHSA. On December 31, 2018, VCUHSA issued a \$50,000,000 subordinated promissory note to the Corporation. Interest on the subordinated

promissory note bears a rate equal to the Libor Market Index plus one percent per annum. At December 31, 2019, accrued interest on the subordinated promissory notes is \$7,391,727. Repayment of principal and/or interest requires prior written approval of the Bureau.

CAPITAL AND SURPLUS REQUIREMENT

Section 38.2-4302 of the Code of Virginia states that an HMO licensed in Virginia shall maintain a minimum net worth in an amount at least equal to the sum of uncovered expenses, but not less than \$600,000, up to a maximum of \$4,000,000. 14 VAC 5-211-30 A requires that an HMO report the sum of its uncovered expenses for each three-month period ending December 31, March 31, June 30 or September 30. Section 38.2-4307.1 C states that a statement of covered and uncovered expenses shall not be required for any HMO that reports capital and surplus of at least \$4,500,000 on its most recent annual or quarterly financial statement. At December 31, 2019, the Corporation reported capital and surplus greater than \$4,500,000 and was not required to file a statement of covered and uncovered expenses.

MANAGEMENT AND CONTROL

The bylaws of the Corporation provide that the Board of Directors shall be responsible for the business and affairs of the Corporation. Directors are elected for three-year staggered terms at the annual meeting of the shareholders. On December 9, 2015, the Board approved a decrease in the number of Directors from nine to seven. The Directors shall be divided into three groups, each of which shall consist of as close to one-third of the total number of Directors as possible. A majority of the Board of Directors shall constitute a quorum for the transaction of business.

The officers of the Corporation shall consist of a President, a Chief Executive Officer, a Treasurer, and such other officers as the Board of Directors may from time to time elect. Each such officer shall hold office at the pleasure of the Board of Directors and until their successors are elected.

At December 31, 2019, the Board of Directors and Officers were as follows:

<u>Directors</u> <u>Principal Occupation</u>

Arline D. Bohannon, M.D. Internal Medicine Physician

VCU Medical Center Richmond, Virginia

COMMONWEALTH OF VIRGINIA STATE CORPORATION COMMISSION BUREAU OF INSURANCE Mae H. Fox Director of Government Relations

Eckert Seamans Law Firm

Richmond, Virginia

Jennifer L. McClellan Assistant General Counsel

Mid-Atlantic South at Verizon

Richmond, Virginia

Marsha D. Rappley, M.D. VCU – Vice President for Health Services

VCU Health System Authority – Chief Executive Officer

Richmond, Virginia

Susan D. Roseff, M.D. VCU - Vice Chair Department of Pathology

Division Chair, Clinical Pathology

Richmond, Virginia

Donald R. Stern, M.D. Director

Richmond City Health District

Richmond, Virginia

Joseph M. Teefey Retired Director

Department of Medical Assistance Services

Richmond, Virginia

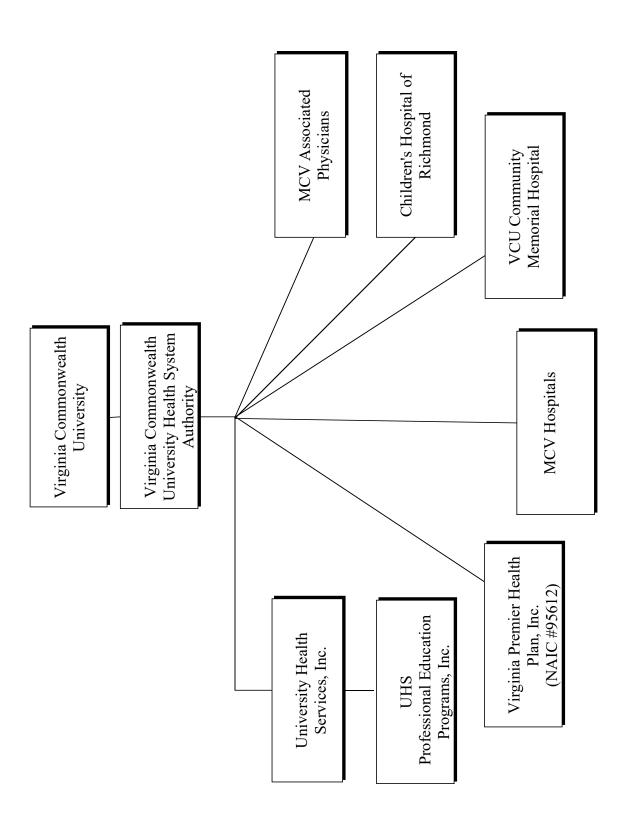
Officers

Marsha D. Rappley, M.D. Chair

Linda Hines President and Chief Executive Officer
Tim E. Carpenter Chief Financial Officer and Treasurer

AFFILIATED COMPANIES

At December 31, 2019, the Corporation is a wholly owned subsidiary of VCUHSA. The chart on the following page illustrates the organizational structure of the Corporation and selected affiliated entities at December 31, 2019.



COMMONWEALTH OF VIRGINIA STATE CORPORATION COMMISSION BUREAU OF INSURANCE

TRANSACTIONS WITH AFFILIATES

Administrative Service Agreement

Effective January 1, 2002, the Corporation entered into an Administrative Service Agreement with VCUHSA. Pursuant to the agreement, the Corporation and VCUHSA shall perform certain administrative services for each other to include executive management reporting, treasury management services, information system services and regulatory and financial management. For these services, the Corporation and VCUHSA shall reimburse each other all direct costs and indirect allocable costs incurred. The agreement shall remain in effect unless terminated for cause by the Corporation with immediate effect or until terminated by either party upon thirty days written notice. The Corporation incurred \$6,527,000 and \$10,706,000 in fees related to this agreement in 2019 and 2018, respectively.

Provider Agreements

The Corporation contracts with a number of subsidiaries of VCUHSA to provide hospital, physician and other medical services to its members.

TERRITORY AND PLAN OF OPERATION

At December 31, 2019, the Corporation's service area, as reported in its 2019 Annual Statement, included the Virginia cities of Alexandria, Arlington, Bristol, Buena Vista, Charlottesville, Chesapeake, Colonial Heights, Covington, Danville, Emporia, Fairfax, Falls Church, Fredericksburg, Galax, Hampton, Harrisonburg, Hopewell, Lexington, Lynchburg, Manassas, Manassas Park, Martinsville, Newport News, Norfolk, Norton, Petersburg, Poquoson, Portsmouth, Radford, Richmond, Roanoke, Salem, Staunton, Suffolk, Virginia Beach, Waynesboro, Williamsburg and Winchester and the Virginia counties of Accomack, Albemarle, Allegheny, Amelia, Amherst, Appomattox, Augusta, Bath, Bedford, Bland, Botetourt, Brunswick, Buchanan, Buckingham, Campbell, Carroll, Charles City, Charlotte, Clarke, Clifton Forge, Craig, Cumberland, Dickenson, Dinwiddie, Essex, Fauquier, Floyd, Fluvanna, Franklin, Frederick, Giles, Gloucester, Goochland, Grayson, Greene, Greensville, Halifax, Hanover, Henrico, Henry, Highland, Isle of Wright, James City, King and Queen, King George, King William, Lancaster, Lee, Loudoun, Louisa, Lunenburg, Matthew, Mecklenburg, Middlesex, Montgomery, Nelson, New Kent, Northampton, Northumberland, Nottoway, Page, Patrick, Pittsylvania, Powhatan, Prince Edward, Prince George, Prince William, Pulaski, Richmond, Roanoke, Rockbridge, Rockingham, Russell, Scott, Shenandoah, Smyth, South Boston, Southampton, Spotsylvania, Stafford, Surry, Tazewell, Washington, Sussex, Westmoreland, Wise and Wythe.

Physician services are provided by physicians in independent practice in the Corporation's service area. Each member selects a Primary Care Physician ("PCP") from the list of the Corporation's primary providers. The PCP is the coordinator for all of the member's health care needs. All specialty services and all hospital admissions and outpatient surgery require a prior written referral (except in emergencies) from a PCP.

In January 2019, the Corporation began accepting membership in the individual marketplace of the Virginia Insurance Exchange. At December 31, 2019, the Corporation had 4,256 members in the Exchange.

HEALTH CARE SERVICES AGREEMENTS

At December 31, 2019, the Corporation had entered into a Medallion 4.0 Medicaid Managed Care Services Agreement and a Family Access to Medical Security Insurance ("FAMIS") Agreement with the Virginia Department of Medical Assistance Services ("DMAS"). Pursuant to these agreements, the Corporation is responsible for directly providing, arranging, purchasing, or otherwise making available the full scope of services to which enrollees are entitled under the respective programs. As compensation for these services, DMAS pays the Corporation a monthly capitation fee based on each enrollees number, age, and sex.

Additionally, at December 31, 2019, the Corporation had an agreement with the Centers for Medicare and Medicaid Services and DMAS to provide services under the Commonwealth Coordinated Care Program established by the Commonwealth of Virginia. The program pays capitated fees to the Corporation to provide managed care services to Virginia residents who are eligible for both Medicare and Medicaid services.

PROVIDER AGREEMENTS

Medical Services

The Corporation has entered into agreements with numerous PCPs and specialist physicians to render, provide or arrange for the provision of covered health care services to members. The Corporation compensates physicians either on a capitated basis or a feefor-service arrangement. Specialist physicians are compensated on a fee-for-service basis in accordance with the Corporation's fee schedule for the particular covered service.

Hospital Care

The Corporation has entered into agreements with a number of hospitals in its service area to provide covered hospital services to its members. Charges for services rendered are in accordance with compensation schedules attached to each individual agreement.

Other Health Care Services

The Corporation has entered into various ancillary service agreements. These agreements provide home health care services, pharmacy services, laboratory services, durable medical equipment and other related covered health care services. Compensation is based on arrangements set forth in each agreement.

BENEFITS

The general benefits available to the Corporation's Medicaid enrollees when provided by PCPs, specialist physicians and other professional providers and approved by the Corporation are as follows:

- 1. Inpatient Hospital Services
- 2. Outpatient Medical Care
- 3. Physician Services
- 4. Maternity Care
- 5. Maternal and Infant Care Coordination
- 6. Women's Wellness Program
- 7. Well Child Program
- 8. Rehabilitation Services
- 9. Home Health Services
- 10. Family Planning
- 11. Vision Care
- 12. Mental Health Services
- 13. Disease Management
- 14. Prescription Drugs
- 15. Durable Medical and Prosthetic Devices
- 16. Transportation Services
- 17. Health Education Programs

Exclusions generally consist of services obtained without prior written referral by the member's PCP; inpatient care in a long-term care institution; chiropractic services; experimental or investigational procedures; private duty nursing; and substance abuse services. The above are general summaries of coverages and exclusions and are not intended to be all inclusive.

GROWTH OF THE CORPORATION

The following data represents the growth of the Corporation for the ten-year period ending December 31, 2019. The data is compiled from the Corporation's filed Annual Statements, previous examination reports, and the current examination report.

		Total Admitted	To	otal	Capital And
	<u>Year</u>	<u>Assets</u>	<u>Liab</u>	<u>oilities</u>	<u>Surplus</u>
	2010	\$131,958,11	9 \$70,12	23,890	\$61,834,229
	2011	133,759,09		07,740	61,851,358
	2012	167,454,95	0 93,52	20,641	73,934,309
	2013	183,628,67	6 83,82	25,680	99,802,996
	2014	282,292,36	7 124,55	54,682	157,737,685
	2015	281,926,69	6 113,64	46,408	168,280,288
	2016	302,790,66	2 102,96	62,403	199,828,259
	2017	366,448,08	6 160,30	09,355	206,138,731
	2018	355,720,23	5 194,27	77,798	161,442,437
	2019	465,872,88	5 252,32	22,047	213,550,838
		Net	Medical &		Pre-Tax
	Total	Investment	Hospital	Administrati	ive Income
Year	Revenue	<u>Gain</u>	<u>Expenses</u>	<u>Expenses</u>	(Loss)
2010	\$531,288,281	\$339,769	\$457,657,514	\$46,781,0	33 \$27,189,503
2011	524,691,209	694,771	453,656,691	50,012,6	, ,
2012	586,064,368	182,337	526,514,034	44,998,0	
2013	714,904,228	2,385,728	656,274,001	51,734,6	9,281,285
2014	825,069,219	1,517,781	756,910,163	71,458,3	52 (1,781,515)
2015	1,024,582,569	1,073,856	923,904,360	84,723,3	22 17,028,743
2016	1,070,388,753	(541,122)	941,859,447	97,086,9	46 30,901,238
2017	1,206,947,465	5,303,031	1,049,082,755	137,568,6	25,599,088
2018	1,462,726,346	5,402,013	1,359,014,028	191,877,7	26 (82,763,395)
2019	1,991,996,925	4,172,393	1,767,474,409	192,629,0	27 36,065,882

The Corporation's enrollment data at year-end is illustrated as follows:

Number of
<u>Members</u>
155,575
143,029
171,821
175,491
190,106
193,594
195,467
218,371
214,927
284,540

EXCESS LOSS INSURANCE

At December 31, 2019, the Corporation had an Excess Loss Insurance Policy in force with Swiss Re Life & Health America, Inc. ("Swiss Re"). Under the terms of the agreement, the deductible is \$450,000 per member per policy year. Once the deductible has been reached, Swiss Re will reimburse the Corporation 90% of all eligible expenses. The maximum insurance coverage payable under the policy for each member during any policy year shall be \$5,000,000. The agreement includes a continuation of coverage endorsement in the event of the Corporation's insolvency.

SPECIAL RESERVES AND DEPOSITS

At December 31, 2019, the Bureau required that the Corporation maintain a \$586,190 minimum deposit with the Treasurer of Virginia.

FINANCIAL STATEMENTS

The following financial statements present the financial condition of the Corporation for the period ending December 31, 2019. No examination adjustments were made to the statutory financial statements filed by the Corporation with the Bureau for the period ending December 31, 2019.

ASSETS

	Assets	Nonadmitted <u>Assets</u>	Net Admitted <u>Assets</u>
Bonds	\$8,231,135		\$8,231,135
Common stocks	65,492,715		65,492,715
Properties held for the production			
of income	303,075		303,075
Cash, cash equivalents and short-term			
investments	95,830,016		95,830,016
Other invested assets	60,148,981		60,148,981
Aggregate write-ins for invested assets	12,138,694	11,783,928	354,766
Subtotals, cash and invested assets	\$242,144,616	\$11,783,928	\$230,360,688
Investment income due and accrued	77,468		77,468
Uncollected premiums and agents' balances			
in the course of collection	181,046,362		181,046,362
Amounts recoverable from reinsurers	1,866,950		1,866,950
Electronic data processing equipment			
and software	15,774,176	14,658,471	1,115,705
Furniture and equipment, including health			
care delivery assets	2,839,518	2,839,518	0
Receivables from parent, subsidiaries			
and affiliates	39,177,794		39,177,794
Health care and other amounts receivable	17,791,011	5,563,093	12,227,918
Total assets	\$500,717,895	\$34,845,010	\$465,872,885

LIABILITIES, CAPITAL AND SURPLUS

	Covered	Uncovered	<u>Total</u>
Claims unpaid	\$175,806,381		\$175,806,381
Unpaid claims adjustment expenses	5,043,036		5,043,036
Aggregate health policy reserves	12,522,141		12,522,141
Premiums received in advance	316,363		316,363
General expenses due or accrued	40,942,450		40,942,450
Amounts due to parent, subsidiaries			
and affiliates	89,464		89,464
Aggregate write-ins for other			
liabilities	125,355,805	(107,753,593)	17,602,212
Total liabilities	\$360,075,640	(\$107,753,593)	\$252,322,047
Common capital stock			\$10,000
Gross paid in and contributed surplus			9,261,977
Surplus notes			98,750,000
Unassigned funds (surplus)			105,528,861
Total capital and surplus			\$213,550,838
Total liabilities, capital and surplus			\$465,872,885

STATEMENT OF REVENUE AND EXPENSES

	Uncovered	Total
Net premium income Aggregate write-ins for other health care	XXX	\$1,991,575,627
related revenues	XXX	421,298
Total revenues	XXX	\$1,991,996,925
Hospital and Medical		
Hospital/medical benefits Other professional services Outside referrals Emergency room and out-of-area Prescription drugs	\$36,858,871 73,474,361 30,000,484 509,466	\$463,257,576 833,678,289 60,586,641 70,555,619 336,975,620
Subtotal	\$140,843,182	\$1,765,053,745
Less:		
Net reinsurance recoveries		(2,420,664)
Total hospital and medical	\$140,843,182	\$1,767,474,409
Claims adjustment expenses General administrative expenses		33,255,912 159,373,115
Total underwriting deductions	\$140,843,182	\$1,960,103,436
Net underwriting gain	XXX	\$31,893,489
Net investment income earned		\$3,856,712
Net realized capital gains		315,681
Net investment gains		\$4,172,393
Net income before federal income taxes	XXX	\$36,065,882
Federal income taxes incurred	XXX	0
Net income	XXX	\$36,065,882

RECONCILIATION OF CAPITAL AND SURPLUS

	<u>2017</u>	<u>2018</u>	<u>2019</u>
Capital and surplus prior reporting year	\$199,828,259	\$206,138,731	\$161,442,437
GAINS AND LOSSES TO CAPITAL AND SURPLUS			
Net income (loss)	\$25,765,928	(\$82,763,395)	\$36,065,882
Change in net unrealized capital gains	10,610,153	(8,555,651)	18,957,672
Change in nonadmitted assets	(3,815,609)	(3,377,248)	(2,915,153)
Change in surplus notes	(26,250,000)	50,000,000	0
Net change in capital and surplus	\$6,310,472	(\$44,696,294)	\$52,108,401
Capital and surplus end of reporting year	\$206,138,731	\$161,442,437	\$213,550,838

CASH FLOW

Cash from Operations

Premiums collected net of reinsurance Net investment income Miscellaneous income Total	\$1,946,694,041 4,269,653 421,298 \$1,951,384,992		
Benefit and loss related payments Commissions, expenses paid and aggregate write-ins for deductions Total	\$1,737,034,123 157,588,826 \$1,894,622,949		
Net cash from operations	\$56,762,043		
Cash from Investments			
Proceeds from investments sold, matured or repaid Bonds Stocks Other invested assets Total investment proceeds Cost of investments acquired (long-term only) Bonds	\$31,731,770 147,062 3,351,962 \$35,230,794 \$23,659,934		
Stocks Miscellaneous applications Total investment acquired	4,843,048 180,525 \$28,683,507		
Net cash from investments	\$6,547,288		
Cash from Financing and Miscellaneous Sources			
Cash provided (applied): Other cash applied	(\$42,290,317)		
Net cash from financing and miscellaneous sources	(\$42,290,317)		
RECONCILIATION OF CASH AND SHORT-TERM INVESTMENTS			
Net change in cash and short-term investments	\$21,019,013		
Cash and short-term investments: Beginning of the year End of the year	74,811,003 \$95,830,016		
Dia of the your	Ψ/2,030,010		

SUBSEQUENT EVENTS

1. On March 11, 2020, The World Health Organization declared the spreading coronavirus (COVID-19) outbreak a pandemic. On March 13, 2020, U.S. President Donald J. Trump declared the coronavirus pandemic a national emergency in the United States. The epidemiological threat posed by COVID-19 is having disruptive effects on the economy, including disruption of the global supply of goods, reduction in the demand for labor, and reduction in the demand for U.S. products and services, resulting in a sharp increase in unemployment. The economic disruptions caused by COVID-19 and the increased uncertainty about the magnitude of the economic slowdown has also caused extreme volatility in the financial markets.

The full effect of COVID-19 on the U.S. and global insurance and reinsurance industry is still unknown at the time of releasing this report. The Bureau is expecting the COVID-19 outbreak to impact a wide range of insurance products resulting in coverage disputes, reduced liquidity of insurers, and other areas of operations of insurers. The Bureau and all insurance regulators, with the assistance of the NAIC, are monitoring the situation through a coordinated effort and will continue to assess the impacts of the pandemic on U.S. insurers. The Bureau has been in communication with the Corporation regarding the impact of COVID-19 on its business operations and it's financial position. No current material operational, solvency or liquidity concerns resulted from the high level assessment of the Corporation's operational and solvency position as a result of COVID-19.

- 2. On March 25, 2020, the VCUHSA Board of Directors adopted a resolution to cancel and forgive the \$48,500,000 (balance of the original \$75,000,000 subordinated promissory note) and the \$50,000,000 subordinated promissory notes plus accrued interest issued to the Corporation on June 1, 2014 and December 31, 2019, respectively.
- 3. On March 31, 2020, the Bureau approved a change in control of the Corporation. Pursuant to a Stock Purchase Agreement, Sentara Healthcare, Inc. (Sentara) purchased 80% of the issued and outstanding common stock of the Corporation. Following closing on April 7, 2020, Sentara's President and Chief Executive Officer, Dennis Matheis, became the Chief Executive Officer of the Corporation. The Corporation will continue to operate under the oversight and direction of its Board of Directors. The Board will consist of ten directors with eight directors elected by Sentara and two elected by VCUHSA. The Corporation will continue to operate as a separate company retaining its name. The Corporation will continue writing the same business and coverages in the same geographic areas in Virginia, however, the Corporation will cease participation in the individual marketplace of the Virginia Insurance Exchange after the 2020 plan year.

CONCLUSION

The courteous cooperation extended by the Corporation's officers and employees during the course of the examination is gratefully acknowledged. In addition to the undersigned, Gerald Hicks, Kevin Knight, CFE, and Ben MacKercher, AFE, participated in the work of the examination.

Respectfully submitted,

Kenneth G. Campbell, CFE

Kennery L. Craphell

Assistant Chief Examiner



Virginia Premier Health Plan, Inc. 4417 Corporation Lane Virginia Beach, VA 23462 757.552.7306 www.virginiapremier.com

November 13, 2020

David H. Smith Chief Examiner Virginia Bureau of Insurance 1300 East Main Street Richmond, VA 23219

David,

We acknowledge receipt of the draft report. We wish to express our appreciation to you and your staff for conducting an efficient and well-coordinated examination.

In terms of copies, if possible we would like to receive 12 copies.

Thank you,

Dennis Matheis

President, Virginia Premier Health Plan, Inc.