



May 7, 2020

Jude Daye, Executive Assistant
Blue Cross and Blue Shield of Vermont
445 Industrial Lane
Montpelier, VT 05601

Re: Blue Cross and Blue Shield of Vermont
2021 Association Health Plan Filing
SERFF Tracking #: BCVT-132360219

Dear Jude Daye:

We have been retained by the Green Mountain Care Board (“GMCB”) to review the above referenced group products filing submitted on 4/30/2020. The following additional information is required for this filing.

Notice regarding proper responses:

- A minimum-acceptable response to quantitative questions from us must include a spreadsheet calculation with retained formulas such that we can replicate the calculations therein.
- Explanatory responses are merely a supplement to the spreadsheet material and in of themselves will constitute a lack of response.

Questions:

1. Has the form filing been approved by DFR?
2. How much enrollment is anticipated for 2021 on the AHP product?
3. How do the utilization trends in Vermont compare to the Blue Trend Survey or other nationwide utilization trends?
4. Provide the quantitative support for the unit cost trends on pages 6 and 7 of the Actuarial Memorandum.
5. The table Calculation of the Manual Rate (Actives) in the actuarial memorandum (pg 20) appears to contain errors. For example, the intended value for C is unclear and neither E nor G follows the formula shown. Please provide a corrected version.
6. Please provide all exhibits in excel format.
7. It appears that no adjustments were made to the experience for potential impacts of COVID-19 on future costs. Please describe the Company's rationale for not incorporating an impact.

8. Please confirm that the "Facility" and "Professional" claims used to develop utilization and unit cost trends exclude claims relating to pharmaceuticals covered by the medical benefit.

Please be aware that we expect to have further questions regarding the filing as the review continues.

To ensure that the review of your filing has been completed before statutory deadlines, we expect you to respond as expeditiously as possible to every objection in our letter, but no later than May 18, 2020. Note that the responses can be submitted separately and do not have to be submitted all at the same time.

We trust that you understand these forms may not be used in Vermont until they are formally approved by the GMCB.

Sincerely,

Kevin Rugeberg, ASA, MAAA
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