



May 19, 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  
2020 Vermont Individual and Small Group Rate Filing  
SERFF Tracking #: BCVT-131936226

Dear Jude Daye:

We have been retained by the Green Mountain Care Board ("GMCB") to review the above referenced group products filing submitted on 5/10/2019. 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. Exhibit 9B shows the VT standard plans, as well as plans denoted "Vermont Preferred" and "Vermont Select." This appears to agree with the actuarial memorandum which describes the "Rewards" plans as replaced by these. The URRT shows projected enrollment for all of these plans, as well as projected renewals for "Rewards". Please clarify whether there will be renewals for "Rewards" plans and if so which premiums from Exhibit 9B are applicable.
2. Please provide the RATEE report from CMS.
3. Please clarify the statement in section 3.3 of the memorandum which states that the allowed charges are \$703.28 PMPM in the experience period. Both sections 3.1 and 3.3 appear to describe this value as \$665.15.
4. Please reconcile the c1 factor as described in the memorandum (0.9961) to the value shown in Exhibit 5 (0.9963).
5. The description of the GMCB billback amount appears to assume that the portion of the BCBSVT invoice attributable to VISG enrollment is unchanged between FY2019

and FY2020. In light of the substantial enrollment changes that have occurred during that period, please clarify if that is the intention.

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 27, 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 Ruggeberg, ASA, MAAA  
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