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June 11, 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 Vermont Individual and Small Group Rate Filing
        SERFF Tracking #: BCVT-132371410

Dear Jude Daye:

Thank you for your responses. We request the following further information.

Questions:

1. Provide total claims PMPM by incurral month for the most recent three years of experience, normalized for contract changes, for individual, small group, and combined.
2. Provide total claims PMPM by incurral month for the most recent three years of experience, normalized for contract changes and changes in PLRS, for individual, small group, and combined.
3. Reconcile the market-adjusted index rate in Exhibit 5 to the market-adjusted index rate in the URRT.
4. Demonstrate that the population changes to projected claims contained in factors b9 and c3 were developed in a manner consistent with the projection of CY2021 risk transfers.
5. Demonstrate how the trend factor developed in Exhibit 3E is reflected in the trend compilation of trend factors in Exhibit 3J.
6. How has COVID-19 affected non-benefit costs (expenses such as claims adjudication, overhead, travel, profit, etc)?
7. Describe how Vermont consumers were considered in light of the current savings due to the COVID-19 pandemic and this unprecedented time.

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 June 16, 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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