



May 24, 2021

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
2022 Vermont Individual and Small Group Rate Filings
SERFF Tracking #: BCVT-132829562 and BCVT-132829271

Dear Jude Daye:

Thank you for your response to our previous letter. We request the following information:

Questions:

1. In the Individual filing, Exhibit 9A, the Average members per Subscriber is shown as 1.5046. However, that exhibits shows a total of 15,878 members and 10,648 subscribers, for a ratio of 1.4912. Similarly, we cannot replicate the average tier factor. The impact appears to be that the Single Conversion Factor appears to be overstated by approximately 0.15%. Please confirm.
2. The memorandum states that the total allowed pharmacy trend in Exhibit 3I is 8.4%. However, Exhibit 3I seems to show this value as 11.1% (including contract changes). Please reconcile this apparent discrepancy.
3. Reconcile the base period claims, trend factors, and "Other" factors between Exhibit 5 and the URRT.
4. Wakely recently released a small change to the Standard Bronze CDHP plan. Please provide a revised copy of Exhibit 9B reflecting the anticipated premiums including this change to benefits.
5. Provide actual-to-expected Rx trend results from 2016-2020.
6. How has COVID-19 affected non-benefit costs (expenses such as overhead, travel, claims adjudication, profit, etc.)

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 31, 2021. 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, FSA, MAAA
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