

**STATE OF VERMONT  
GREEN MOUNTAIN CARE BOARD**

In re: Blue Cross Blue Shield of Vermont    )  
      2023 Individual Filing                    )  
  )  
  SERFF No. BCVT-133243519

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In re: Blue Cross Blue Shield of Vermont    )  
      2023 Small Group Filing                )  
  )  
  SERFF NO. BCVT-133243509

**RESPONSE OF BLUE CROSS TO  
JUNE 17, 2022 HCA NON-ACTUARIAL QUESTION**

Blue Cross and Blue Shield of Vermont provides the following response to the HCA's June 17, 2022 question:

**Question 1**

BCBSVT states: "Blue Cross has continued support of legislation that would enhance affordability by keeping the individual and small group markets separate in order to capture premium savings of an estimated 6.0 percent for Vermont small businesses while drawing millions of dollars in federal funds to aid lower-income Vermont individuals and families." Actuarial Mem. 10. Please confirm that BCBSVT is referring to state advocacy to unmerge the individual and small group markets and the position that the unmerge should happen even though subsidies to protect individual group members are not in place for 2023.

**Response**

Blue Cross confirms that this statement refers to advocacy in support of unmerging the individual and small group markets regardless of the continuation of the expanded federal subsidies.

Dated: June 22, 2022

/s/ Benjamin D. Battles

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## CERTIFICATE OF SERVICE

I certify that I have served the above Response to June 17, 2022 HCA Non-Actuarial Questions on Michael Barber, Laura Beliveau, Christina McLaughlin, and Jennifer DaPolito of the Green Mountain Care Board; and on Jay Angoff, Eric Schultheis, and Charles Becker, counsel for the Office of the Health Care Advocate, by electronic mail, this 22nd day of June, 2022.

/s/ Benjamin D. Battles

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