



June 20, 2022

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
2023 Vermont Individual and Small Group Rate Filings
SERFF Tracking #: BCVT-133243519 and BCVT-133243509

Dear Jude Daye:

Thank you for your responses. We request the following information regarding this filing.

Questions:

1. While we recognize that an explicit adjustment is being made only to Emergency, Urgent Care, and Ambulance, this comes with an implicit adjustment of zero percent to all other claims (excluding influenza). We would expect that of all service categories, emergent care would be among the least sensitive to suppression from COVID-19. Explain why it is reasonable to assume that emergent care is more sensitive to COVID-19 than non-emergent care.
2. We note a July 2021 report released by DFR¹ seemingly references BCBSVT predicting that 2021 claims in the Vermont Individual and Small group markets would be increased by approximately \$2.3 million for “returning utilization” and “Other Changes in Demand for Services,” and have no impact from “reduced utilization.”

Please explain what new information led to the assumption in the 2023 rate filing that 2021 claims, aggregated across all service categories, were suppressed by COVID-19, given what appears to be a prediction from last year that those claims would be increased by COVID-19.

¹ https://dfr.vermont.gov/sites/finreg/files/doc_library/dfr-report-financial-impacts-covid-health-insurance.pdf

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 27, 2022. Note that the responses can be submitted separately and do not have to be submitted all at the same time.

Sincerely,

Kevin Rugeberg, FSA, MAAA
Vice President & Consulting Actuary
Lewis & Ellis, Inc.
KRugeberg@lewisellis.com
(972)850-0850