



March 16, 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  
3Q 2021 LG Rating Program Filing  
SERFF Tracking #: BCVT-132713612

Dear Jude Daye:

Thank you for your responses to our previous request. We require the following information to continue our review of this filing.

Questions:

1. Provide more detail regarding the confidential unit cost support provided.
2. As noted in the 2019Q3 filing, the administrative charge for January 2019 renewals was \$40.85 PMPM. The proposed administrative charge for 2022 renewals is \$61.50 PMPM. This represents a 50% increase in administrative cost PMPM in the span of three years. What specific items have contributed to these increases? Please provide more detail that itemizes these increases and explanations or justifications for these increases.

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 March 23, 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  
Vice President and Consulting Actuary  
Lewis & Ellis, Inc.  
kruggeberg@lewisellis.com  
(972)850-0850