



March 4, 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, The Vermont Health Plan
3Q 2022 LG Rating Program Filing
SERFF Tracking #: BCVT-133154621, BCVT-133154563

Dear Jude Daye:

We have been retained by the Green Mountain Care Board (“GMCB”) to review the above referenced group products filings submitted on 2/17/2022. The following additional information is required for these filings.

Notice regarding proper responses:

- A minimum-acceptable response to quantitative questions from us must include a spreadsheet calculation with retained formulas such that we can replicate the calculations therein.
- Explanatory responses are merely a supplement to the spreadsheet material and in of themselves will constitute a lack of response.

Questions:

1. Please provide the “Exhibits” file in Excel, with working formulas, similar to prior filings.
2. Provide an exhibit demonstrating consistency between approved hospital budgets and the proposed medical unit cost trend.
3. Please list all rating variables which vary between the TVHP and BCBSVT filings.
4. Provide the actual to expected pooling charge for the last three years.

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 11, 2022. 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 Rugeberg, FSA, MAAA
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