

June 10, 2022

Kevin Rugeberg, FSA, MAAA  
Vice President & Consulting Actuary  
Lewis & Ellis, Inc.

**Subject: Your 06/03/2022 Questions re:  
Blue Cross and Blue Shield of Vermont  
2023 Vermont ACA Market - Individual and Small Group Rate Filings  
(SERFF Tracking #: BCVT-133243519 and BCVT-133243509)**

Dear Mr. Rugeberg:

In response to your requests dated June 3, 2022, here are *your questions* and our answers:

1. *Please explain why the "Impact of Silver Loading" factors are higher in exhibit "6C-CMB" than they are in exhibit "6C-IND".*

We calculated a PMPM Silver Loading impact for each of the four silver plans offered on-Exchange. Since the projected period allowed claims for experience EHB on 6C-CMB is lower (\$906.79) than on 6C-IND (\$984.40), the multiplicative factors are higher.

Please see tab "Q1" in attached *Responses to Responses to Blue Cross 2023 ACA Rate Filings - Inquiry 3.xlsx* for the details of calculation of the CSR Silver Load.

2. *The actuarial memorandum states that the CSR distribution is expected to return to the 2020 levels. Please provide the 2020 and 2021 distributions by CSR level for individual Silver members.*
3. *What would the Silver Loads be using the 2021 enrollment rather than the 2020?*

We are answering questions 2 and 3 together.

The actuarial memorandum was not sufficiently detailed in its description of this component. There are two factors included in the calculation of the silver loading factor: the percentage of silver members who are on a federal CSR plan and the distribution by federal CSR level.

Consistent with prior filings, we used the current snapshot of enrollment (February 2022 in this case) as the distribution by federal CSR level. However, we observed that the February 2022 percentage of Silver members on a federal CSR plan was significantly lower than historical experience. We attribute this anomaly to the suspension of Medicaid eligibility certification during the public health emergency, which has resulted in many Vermonters remaining on the Medicaid rolls who would otherwise have enrolled in a federal CSR plan. The table below shows the percentage by period.

Period	Percentage of CSR Members
2019	72.7%
2020	72.9%
2021	70.7%
Feb 2022	65.7%

Consistent with the membership assumptions described in section 3.4.1 of the actuarial memorandum, we expect Medicaid recertification and enrollment to return to normal patterns by 2023. We therefore selected the 2020 observation, which is the most recent data point that is consistent with historical norms, as the percentage of CSR members.

Since there are two distinct factors included in the calculation, only one of which was informed by 2020 and neither of which was informed by 2021, it is unclear how to best respond to your specific questions. Having augmented our documentation with a more complete description of the calculation, we stand ready to provide any additional support or analysis that would be helpful.

4. *Provide support for the "Increase for the impact of new groups" on the tab "Exh 2E-SMG" in the exhibits file.*

The increase in the impact of new groups is the average impact of new groups on the ASF over the most recent four years (rows 10-13 of Exh 2E-SMG).

5. *We understand that the benefit design for some plans may have changed as a result of the final HSA requirements for 2023. Please provide revised rates reflecting the updated benefits as approved by the Department of Financial Regulation.*

Please see tabs "Exh 1A - Updated", "Exh 1B – Updated", "Exh 9B – IND – Updated", "Exh 9B – SMG – Updated", and "Exh 9B – CMB – Updated" in attached *Responses to Responses to Blue Cross 2023 ACA Rate Filings - Inquiry 3.xlsx*. Note that these reflect only the changes in benefits from the filed rates and neither the updated risk adjustment transfer nor the corrected medical cost trend.

The original AV certification for plan designs has conflicting information about the OOPM for the Standard Silver CDHP CSR 73% plan. The filed rates reflected a \$5,900 OOPM (rather than \$6,000) in the calculation of the silver loading factor. The additional change in benefit results in this particular plan showing a greater impact of the benefit change.

While updating the benefit designs on Exhibit 1B, we noticed that the documentation of the Rx OOPM for the Vermont Preferred Gold plan had the incorrect value. The filing exhibit displayed \$1,250 rather than \$1,450. The correct value was used for pricing.

6. *The actuarial memorandum, section 3.8.7.1, shows credit card fees being applied as a percentage of the total premium, rather than the member responsibility premium. Wouldn't only the member responsibility premium component be subject to debit/credit card fees, with the remainder paid by HHS with presumably lower transaction costs?*

While we apply the credit card fee as a percentage of the total premium, the calculation of the fee reflects that it would only be applied to the member responsibility portion of the premium.

The table below shows the actual individual experience for February and March 2022 to demonstrate the calculation of the credit card fees.

<b>Actual Individual Market Premium, Subsidies, and Card Fees</b>	
Billed Premium PMPM	\$687.19
Subsidies PMPM	\$349.27
Member Responsibility PMPM	\$337.92
Credit Card Fees PMPM	\$1.72
Credit Card Fees as a percent of Member Responsibility	0.5%
Credit Card Fees as a percent of Billed Premium	0.25%

7. *Your prior response relating to facility utilization trend argues that a rising level of utilization is supported actual 2021 results. However, the 2021 results are adjusted to reflect the "pre-pandemic average", which is higher than 2019 utilization specifically because the utilization trend observed was negative going into COVID. So, it would seem that this argument in support of positive utilization trend assumes a priori that positive trend will occur. Please address this concern.*

The adjustment to reflect the “pre-pandemic average” in our prior response was specifically targeted to ER services. The 2021 results for all other services were not adjusted from the raw observation.

We agree with your premise that assuming an a priori positive trend would not be a valid argument for observing and selecting a positive trend. However, such a premise did not apply here, for two reasons:

- ER services were not trending downward—in fact, they were perfectly flat—in the 14 months leading into the pandemic<sup>1</sup>:

<b>Period</b>	<b>ER Visits per 1,000 members</b>
January 2019 through July 2019	288.83
August 2019 through February 2020	288.75

Therefore, the adjusted 2021 ER PMPM is, appropriately, equal to the PMPM observed from January 2019 through February 2020. It is not “higher than the 2019 utilization,” as your objection suggests.

- Even if we were to fully embrace the spirit of your objection and apply the raw observed 2018 to 2019 facility trend of -2.9 percent to ER services<sup>2</sup>, the adjusted 2021 facility PMPM would be reduced from \$297.28 to \$297.03. Therefore, even after applying this methodology, our observation that “the two-year trend from 2019 to 2021 indicates a positive underlying trend upon adjusting for the suppression of ER services” remains true, and our conclusions remain unaltered.

<sup>1</sup> We have not made an observation about 2018 because that period was not included in the data used for the original ER analysis. The significant effort that would be needed to bring 2018 into the analysis is not feasible within the time allotted for this response.

<sup>2</sup> Nothing in the evidence suggests that -2.9 percent is a reasonable or appropriate trend assumption for facility services or for ER services. We apply this trend here simply to illustrate that even this unreasonably low trend assumption produces a result that is immaterially different from that presented in our previous response.

8. *Your prior response also indicates that the statistical analysis performed supports the 1.5% trend. However, the regression analysis referenced includes Spring 2020 in the first half of the trend period. As such, the trends they report appear to be driven mostly by the return from low COVID utilization, rather than a long-term trend. For example, the "36-Month logistic Regression", which returned 1.6%, returns instead 0.2% if the data from 2020 is excluded. Please address this concern.*

If 2020 experience is removed, it is important to adjust CY 2021 for the artificially dampened ER experience. After adjusting CY 2021 to remove the one-time suppression of ER services, the regression result excluding 2020 is 0.9 percent. Such a result is completely consistent with our assumed facility trend, bearing in mind the expectation that commercial facility trends will naturally increase from recent levels as care shifts from COVID-related treatment to a more typical mix of services and patients.

Furthermore, as noted in last year’s filing, “Calendar year 2018 claims were uncharacteristically high<sup>3</sup>.” This upward fluctuation in 2018 is driving the negative trend observed from 2018 to 2019.

In the 2022 filing, we selected separate assumptions for inpatient and outpatient facility claims. Using the data from the matched population from the 2022 filing to allow us to go back to 2017<sup>4</sup>, and combining inpatient and outpatient facility, we observe the following results:

Year	Facility PMPM, normalized for cost increases, FWA, and working days	Annual Utilization Increase	Two-Year Annualized Utilization Increase
Actual CY2017	\$279.45		
Actual CY2018	\$297.74	+6.5%	
Actual CY2019	\$289.81	-2.7%	1.8%

The data demonstrates that the prevailing facility trend was *not* negative prior to the pandemic. Rather, this apparent negative trend was driven by an unusually high 2018 result. As shown above, trends were positive prior to the pandemic—and, in fact, slightly higher than our selected facility trend in this filing—when taking an appropriately longer view of past experience.

All of these data points point to an underlying facility trend that is in very close proximity to 1.5 percent. The outlier observation of 2018 to 2019 trend is explainable by random fluctuation, and it disappears when incorporated into a broader view. The low regression result cited in this question did not adjust for dampened ER utilization in 2021—once this appropriate adjustment is made, the regression yields a result consistent with our assumption.

A 1.5 percent facility trend from 2021 to 2023 is reasonable, appropriate, and supported by all available data, evidence, and statistical analysis.

<sup>3</sup> Page 26 of the actuarial memorandum of the 2022 Blue Cross Vermont ACA Market Individual and Small Group rate filings (<https://ratereview.vermont.gov/sites/dfr/files/PDF/BCBSVT%202022%20Vermont%20ACA%20Market%20Rate%20Filings%20-%20Actuarial%20Memorandum%20-%20REDACTED.pdf>)

<sup>4</sup> The matched population in the current filings did not extend back to 2017. Undertaking such an extension would be a labor-intensive process that is not conducive to the limited time allotted for actuarial review.

9. *The actuarial memorandum states that "the overall change to 2022 rates due to experience and population changes is 0.6 percent for individual and negative 0.1 percent for small groups." Please provide the calculation behind these figures.*

To calculate each of the reasons for rate increase, we start by decomposing the approved 2022 index rate to show both the underlying projected CY 2021 and the ultimate approved 2022 index rate. From there, we create versions of our internal pricing model that updates one pricing assumption at a time. This results in 67 distinct reasons for rate increase. We then combine the reasons, into broader categories to simplify the reasons for rate increase included in the actuarial memorandum. Since the reasons for rate increases are not calculated independently, we cannot show a specific calculation of the subset of reasons included in the overall change due to experience and population. Rather, we would need to share all 67 versions of our internal pricing model as they build iteratively upon on each other.

The impact of experience and population changes includes the following reasons:

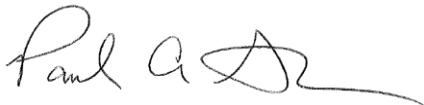
- Replacing expected CY 2021 allowed charges with actual CY 2021 allowed charges, excluding the impacts of cost containment and FWA programs;<sup>5</sup>
- Impacts of demographics and morbidity changes on CY 2022, including both a restatement of the 2022 expected demographics and an additional year of aging;
- Updating risk adjustment; and
- Reflecting updated projected costs for the one high claimant specifically excluded in the buildup of the index rate.

Please see tab "Q9" in attached *Responses to Responses to Blue Cross 2023 ACA Rate Filings - Inquiry 3.xlsx* for the details of the reasons included in this aggregate reason for rate increase.

It is important to note that calculations are performed after the rate development is complete, and that the order of operation will impact each individual reason. These "reasons" are a means to explain the main drivers of rate change, and do not necessarily reflect the way rates have been developed.

Please let us know if you have any further questions, or if we can provide additional clarity on any of the items above.

Sincerely,



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Paul Schultz, F.S.A., M.A.A.A.  
Chief Actuary

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<sup>5</sup> These are rolled into the Premium Mitigation Programs category.

BLUE CROSS AND BLUE SHIELD OF VERMONT  
2023 VERMONT ACA MARKET RATE FILINGS

STATE OF VERMONT STANDARD PLAN DESIGNS  
RESPONSES TO ACTUARIAL INQUIRY 3, DATED JUNE 3, 2022  
Question 1

Calculation of CSR Silver Load – Individual Market							
	Projected Period Allowed Claims for Experience EHB (Exh 6C) (A)	Paid to Allowed Ratio for EHB Portion (Exh 6C) (B)	Normalized Benefit Richness Adjustment for EHB (C)	Projected Paid Claims – Before CSR Load (D) = (A)x(B)x(C)	CSR Load PMPM (E)	Projected Paid Claims – After CSR Load (F)	CSR Silver Load Factor (G) = (F)/(D)
Vermont Preferred Silver	\$984.40	67.97%	0.9807	\$656.16	\$85.08	\$741.23	1.1297
Vermont Select Silver CDHP	\$984.40	68.22%	0.9816	\$659.18	\$79.10	\$738.28	1.1200
Standard Silver	\$984.40	68.73%	0.9834	\$665.36	\$81.48	\$746.84	1.1225
Standard Silver CDHP	\$984.40	71.60%	0.9945	\$700.88	\$68.01	\$768.89	1.0970

Calculation of CSR Silver Load – Combined Market							
	Projected Period Allowed Claims for Experience EHB (Exh 6C) (A)	Paid to Allowed Ratio for EHB Portion (Exh 6C) (B)	Normalized Benefit Richness Adjustment for EHB (Exh 6B) (C)	Projected Paid Claims – Before CSR Load (D) = (A)x(B)x(C)	CSR Load PMPM (E)	Projected Paid Claims – After CSR Load (F)	CSR Silver Load Factor (G) = (F)/(E)
Vermont Preferred Silver	\$906.79	67.97%	0.9689	\$597.17	\$85.08	\$682.25	1.1425
Vermont Select Silver CDHP	\$906.79	68.22%	0.9698	\$599.92	\$79.10	\$679.02	1.1318
Standard Silver	\$906.79	68.73%	0.9716	\$605.55	\$81.48	\$687.02	1.1346
Standard Silver CDHP	\$906.79	71.60%	0.9825	\$637.87	\$68.01	\$705.88	1.1066

BLUE CROSS AND BLUE SHIELD OF VERMONT  
2023 VERMONT ACA MARKET RATE FILINGS

STATE OF VERMONT STANDARD PLAN DESIGNS  
RESPONSES TO ACTUARIAL INQUIRY 3, DATED JUNE 3, 2022  
Question 5

	PLATINUM	GOLD	SILVER	SILVER	BRONZE	BRONZE	BRONZE	SILVER REFLECTIVE	SILVER REFLECTIVE	CATASTROPHIC
	Standard	Standard	Standard	Standard	Standard	Standard	Standard	Standard	Standard	Standard
Deductible/OOP Max	Deductible	Deductible	Deductible	CDHP	Deductible	CDHP	Integrated	Deductible	CDHP	Deductible
Medical Ded	\$425	\$1,400	\$4,000	\$2,100	\$6,450	\$5,800	\$9,000	\$4,000	\$2,100	\$9,100
Rx Ded	\$0	\$200	\$500	Combined	\$1,100	Combined	Combined	\$500	Combined	Combined
Integrated Ded	No	No	No	Yes	No	Yes	Yes	No	Yes	Yes
Medical OOPM	\$1,500	\$5,600	\$9,100	\$7,050	\$9,100	\$7,100	\$9,000	\$9,100	\$7,050	\$9,100
Rx OOPM	\$1,400	\$1,400	\$1,400	\$1,500	\$1,400	\$1,500	Combined	\$1,400	\$1,500	\$1,500
Integrated OOPM	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Family Deductible / OOP	Stacked, 2x Family	Stacked, 2x Family	Stacked, 2x Family	Aggregate, 2x Family, Embedded Individual OOPM of \$9,100	Stacked, 2x Family	Aggregate, 2x Family, Embedded Individual OOPM of \$9,100	Stacked, 2x Family	Stacked, 2x Family	Aggregate, 2x Family, Embedded Individual OOPM of \$9,100	Aggregate, 2x Family, Embedded Individual OOPM of \$9,100
Medical Deductible waived for:	Preventive Care, Office Visits, Urgent Care, Ambulance, Pediatric Dental Class I, Vision	Preventive Care, Office Visits, Urgent Care, Ambulance, Pediatric Dental Class I, Vision	Preventive Care, Office Visits, Urgent Care, Ambulance, Pediatric Dental Class I, Vision	Preventive Care	Preventive Care, Pediatric Dental Class I	Preventive Care	Preventive Care, Office Visits, Pediatric Dental Class I	Preventive Care, Office Visits, Urgent Care, Ambulance, Pediatric Dental Class I, Vision	Preventive Care	Preventive Care, 3 PCP/MH Office Visits
Drug Deductible waived for:	N/A	Generic Scripts	Generic Scripts	Wellness Scripts	Generic Scripts	Wellness Scripts	Generic Scripts	Generic Scripts	Wellness Scripts	N/A
<b>Service Category</b>										
Preventive	\$0	\$0	\$0	0%	\$0	0%	0%	\$0	0%	\$0
PCP Office Visit	3 visits per member combined PCP/MH at no cost share then \$15 copay	3 visits per member combined PCP/MH at no cost share then \$20 copay	3 visits per member combined PCP/MH at no cost share then \$40 copay	10%	\$35	50%	3 visits per member combined PCP/MH at no cost share then \$40 copay	3 visits per member combined PCP/MH at no cost share then \$40 copay	10%	3 visits per member combined PCP/MH at no cost share before deductible then 0% coinsurance
MH/SA Office Visit				10%	\$35	50%			10%	
Chiropractic and Physical Therapy Office Visit	\$20	\$30	\$50	30%	\$40	50%	\$50	\$50	30%	0%
Specialist Office Visit	\$40	\$50	\$90	30%	\$90	50%	\$100	\$90	30%	0%
Urgent Care	\$50	\$60	\$100	30%	\$100	50%	0%	\$100	30%	0%
Ambulance	\$60	\$70	\$100	30%	\$100	50%	0%	\$105	35%	0%
DME	10%	30%	50%	50%	50%	50%	0%	50%	30%	0%
ER	\$100	\$150	\$500	30%	50%	50%	0%	\$500	30%	0%
Radiology (MRI, CT, PET)	10%	30%	50%	30%	50%	50%	0%	50%	30%	0%
Outpatient	10%	30%	50%	30%	50%	50%	0%	50%	30%	0%
Inpatient	10%	30%	50%	30%	50%	50%	0%	50%	30%	0%
Wellness Rx - Generic	\$10	\$12	\$20	\$10	\$15	\$12	\$30	\$20	\$10	0%
Wellness Rx - Preferred Brand	\$50	\$55	\$70	\$40	\$85	40%	0%	\$70	\$40	0%
Wellness Rx - Non-Preferred Brand	50%	50%	50%	50%	60%	60%	0%	50%	50%	0%
Rx Generic	\$10	\$12	\$20	\$10	\$15	\$12	\$30	\$20	\$10	0%
Rx Preferred Brand	\$50	\$55	\$70	\$40	\$85	40%	0%	\$70	\$40	0%
Rx Non-Preferred Brand	50%	50%	50%	50%	60%	60%	0%	50%	50%	0%
Pediatric Vision (Exam and Materials)	\$20	\$20	\$20	\$20	\$20	\$20	\$0	\$20	\$20	0%
Pediatric Dental Class I	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Pediatric Dental Class II	30%	30%	30%	30%	30%	30%	0%	30%	30%	0%
Pediatric Dental Class III	50%	50%	50%	50%	50%	50%	0%	50%	50%	0%

BLUE CROSS AND BLUE SHIELD OF VERMONT  
2023 VERMONT ACA MARKET RATE FILINGS

NON-STANDARD PLAN DESIGNS  
RESPONSES TO ACTUARIAL INQUIRY 3, DATED JUNE 3, 2022

Question 5

	GOLD	GOLD	SILVER	SILVER	BRONZE	BRONZE	SILVER REFLECTIVE	SILVER REFLECTIVE
	Vermont Preferred	Vermont Select	Vermont Preferred	Vermont Select	Vermont Preferred	Vermont Select	Vermont Preferred	Vermont Select
<b>Deductible/OOP Max</b>	<b>4-8-12</b>	<b>CDHP</b>	<b>4-8-12</b>	<b>CDHP</b>	<b>4-8-12</b>	<b>CDHP</b>	<b>4-8-12</b>	<b>CDHP</b>
Medical Ded	\$1,250	\$2,675	\$3,200	\$5,125	\$8,950	\$7,150	\$3,200	\$5,150
Rx Ded	Combined	Combined	Combined	Combined	Combined	Combined	Combined	Combined
Integrated Ded	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Medical OOPM	\$5,150	\$2,675	\$8,550	\$5,125	\$8,950	\$7,150	\$8,550	\$5,150
Rx OOPM	\$1,500	\$1,500	\$1,500	\$1,500	Combined	Combined	\$1,500	\$1,500
Integrated OOPM	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Family Deductible / OOP	Aggregate, 2x Family, Embedded Individual OOPM of \$9,100	Aggregate, 2x Family	Aggregate, 2x Family, Embedded Individual OOPM of \$9,100	Aggregate, 2x Family, Embedded Individual OOPM of \$9,100	Aggregate, 2x Family, Embedded Individual OOPM of \$9,100	Aggregate, 2x Family, Embedded Individual OOPM of \$9,100	Aggregate, 2x Family, Embedded Individual OOPM of \$9,100	Aggregate, 2x Family, Embedded Individual OOPM of \$9,100
Medical Deductible waived for:	Preventive Care, 4 PCP/MH Office Visits, Pediatric Dental Class I, 4 qualified Specialist Visits	Preventive Care	Preventive Care, 4 PCP/MH Office Visits, Pediatric Dental Class I, 4 qualified Specialist Visits	Preventive Care	Preventive Care, 4 PCP/MH Office Visits, Pediatric Dental Class I, 4 qualified Specialist Visits	Preventive Care	Preventive Care, 4 PCP/MH Office Visits, Pediatric Dental Class I, 4 qualified Specialist Visits	Preventive Care
Drug Deductible waived for:	Wellness Scripts	Wellness Scripts	Wellness Scripts	Wellness Scripts	Wellness Scripts	Wellness Scripts	Wellness Scripts	Wellness Scripts
<b>Service Category</b>								
Preventive	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
PCP Office Visit	4 visits per member combined PCP/MH at no cost share before deductible then \$20 copay	0%	4 visits per member combined PCP/MH at no cost share before deductible then \$30 copay	0%	4 visits per member combined PCP/MH at no cost share before deductible then \$0 copay	0%	4 visits per member combined PCP/MH at no cost share before deductible then \$30 copay	0%
MH/SA Office Visit		0%		0%		0%		0%
Chiropractic and Physical Therapy Office Visit	\$30	0%	\$35	0%	\$0	0%	\$35	0%
Specialist Office Visit	4 visits per member at qualified specialists at no cost share before deductible then \$40 copay	0%	4 visits per member at qualified specialists at no cost share before deductible then \$50 copay	0%	4 visits per member at qualified specialists at no cost share before deductible then \$0 copay	0%	4 visits per member at qualified specialists at no cost share before deductible then \$50 copay	0%
Urgent Care	\$40	0%	\$50	0%	\$0	0%	\$50	0%
Ambulance	\$40	0%	\$50	0%	\$0	0%	\$55	0%
DME	\$40	0%	\$50	0%	\$0	0%	\$50	0%
ER	\$250	0%	\$450	0%	\$0	0%	\$450	0%
Radiology (MRI, CT, PET)	\$750	0%	\$1,750	0%	\$0	0%	\$1,750	0%
Outpatient	\$750	0%	\$1,750	0%	\$0	0%	\$1,750	0%
Inpatient	\$750	0%	\$1,750	0%	\$0	0%	\$1,750	0%
Wellness Rx - Generic	\$5	\$5	\$5	\$15	\$15	\$25	\$5	\$15
Wellness Rx - Preferred Brand	\$50	40%	\$50	40%	\$50	65%	\$50	40%
Wellness Rx - Non-Preferred Brand	60%	60%	60%	60%	60%	85%	60%	60%
Rx Generic	\$5	\$5	\$5	\$15	\$0	\$25	\$5	\$15
Rx Preferred Brand	40%	40%	40%	40%	0%	40%	40%	40%
Rx Non-Preferred Brand	60%	60%	60%	60%	0%	60%	60%	60%
Pediatric Vision (Exam and Materials)	\$20	0%	\$20	0%	\$0	0%	\$20	0%
Pediatric Dental Class I	0%	0%	0%	0%	0%	0%	0%	0%
Pediatric Dental Class II	30%	0%	30%	0%	30%	0%	30%	0%
Pediatric Dental Class III	50%	0%	50%	0%	50%	0%	50%	0%



BLUE CROSS AND BLUE SHIELD OF VERMONT  
2023 VERMONT ACA MARKET RATE FILINGS

CONSUMER ADJUSTED PREMIUM RATES - INDIVIDUAL MARKET  
RESPONSES TO ACTUARIAL INQUIRY 3, DATED JUNE 3, 2022  
Question 5

	Plan	Plan Level Adjusted Index Rate	PMPM to Single Contract Conversion Factor	2023 Proposed Rates				2022 Approved Rates				2023 Proposed Rate Increases			
				Single Rate	Couple Rate	Adult and Child(ren) Rate	Family Rate	Single Rate	Couple Rate	Adult and Child(ren) Rate	Family Rate	Single Rate	Couple Rate	Adult and Child(ren) Rate	Family Rate
NON-STANDARD PLANS	Vermont Preferred Gold	\$838.59	1.0747	\$901.23	\$1,802.46	\$1,739.37	\$2,532.46	\$775.41	\$1,550.82	\$1,496.54	\$2,178.90	16.2%	16.2%	16.2%	16.2%
	Vermont Select Gold CDHP	\$856.66	1.0747	\$920.65	\$1,841.30	\$1,776.85	\$2,587.03	\$819.61	\$1,639.22	\$1,581.85	\$2,303.10	12.3%	12.3%	12.3%	12.3%
	Vermont Preferred Silver	\$789.09	1.0747	\$848.03	\$1,696.06	\$1,636.70	\$2,382.96	\$757.46	\$1,514.92	\$1,461.90	\$2,128.46	12.0%	12.0%	12.0%	12.0%
	Vermont Select Silver CDHP	\$785.67	1.0747	\$844.36	\$1,688.72	\$1,629.61	\$2,372.65	\$760.89	\$1,521.78	\$1,468.52	\$2,138.10	11.0%	11.0%	11.0%	11.0%
	Vermont Preferred Bronze	\$612.80	1.0747	\$658.57	\$1,317.14	\$1,271.04	\$1,850.58	\$580.80	\$1,161.60	\$1,120.94	\$1,632.05	13.4%	13.4%	13.4%	13.4%
	Vermont Select Bronze CDHP	\$605.64	1.0747	\$650.88	\$1,301.76	\$1,256.20	\$1,828.97	\$574.06	\$1,148.12	\$1,107.94	\$1,613.11	13.4%	13.4%	13.4%	13.4%
STANDARD PLANS	Standard Platinum	\$1,064.07	1.0747	\$1,143.56	\$2,287.12	\$2,207.07	\$3,213.40	\$1,007.86	\$2,015.72	\$1,945.17	\$2,832.09	13.5%	13.5%	13.5%	13.5%
	Standard Gold	\$883.23	1.0747	\$949.21	\$1,898.42	\$1,831.98	\$2,667.28	\$840.45	\$1,680.90	\$1,622.07	\$2,361.66	12.9%	12.9%	12.9%	12.9%
	Standard Silver	\$795.76	1.0747	\$855.20	\$1,710.40	\$1,650.54	\$2,403.11	\$772.90	\$1,545.80	\$1,491.70	\$2,171.85	10.6%	10.6%	10.6%	10.6%
	Standard Silver CDHP	\$820.25	1.0747	\$881.53	\$1,763.06	\$1,701.35	\$2,477.10	\$789.15	\$1,578.30	\$1,523.06	\$2,217.51	11.7%	11.7%	11.7%	11.7%
	Standard Bronze	\$601.24	1.0747	\$646.15	\$1,292.30	\$1,247.07	\$1,815.68	\$573.09	\$1,146.18	\$1,106.06	\$1,610.38	12.7%	12.7%	12.7%	12.7%
	Standard Bronze CDHP	\$622.12	1.0747	\$668.60	\$1,337.20	\$1,290.40	\$1,878.77	\$590.11	\$1,180.22	\$1,138.91	\$1,658.21	13.3%	13.3%	13.3%	13.3%
	Standard Bronze Integrated	\$620.17	1.0747	\$666.50	\$1,333.00	\$1,286.35	\$1,872.87	\$581.47	\$1,162.94	\$1,122.24	\$1,633.93	14.6%	14.6%	14.6%	14.6%
	Catastrophic	\$261.42	1.0009	\$261.65	\$523.30	\$504.98	\$735.24	\$234.15	\$468.30	\$451.91	\$657.96	11.7%	11.7%	11.7%	11.7%
REFLECTIVE PLANS	Vermont Preferred Silver - Reflective	\$689.83	1.0747	\$741.36	\$1,482.72	\$1,430.82	\$2,083.22	\$661.16	\$1,322.32	\$1,276.04	\$1,857.86	12.1%	12.1%	12.1%	12.1%
	Vermont Select Silver CDHP - Reflective	\$692.33	1.0747	\$744.05	\$1,488.10	\$1,436.02	\$2,090.78	\$676.96	\$1,353.92	\$1,306.53	\$1,902.26	9.9%	9.9%	9.9%	9.9%
	Standard Silver - Reflective	\$700.81	1.0747	\$753.16	\$1,506.32	\$1,453.60	\$2,116.38	\$686.40	\$1,372.80	\$1,324.75	\$1,928.78	9.7%	9.7%	9.7%	9.7%
	Standard Silver CDHP - Reflective	\$742.01	1.0747	\$797.44	\$1,594.88	\$1,539.06	\$2,240.81	\$716.84	\$1,433.68	\$1,383.50	\$2,014.32	11.2%	11.2%	11.2%	11.2%
<b>Total</b>				<b>\$178,251,731</b>				<b>\$158,773,181</b>				<b>12.268%</b>			

BLUE CROSS AND BLUE SHIELD OF VERMONT  
2023 VERMONT ACA MARKET RATE FILINGS

CONSUMER ADJUSTED PREMIUM RATES - INDIVIDUAL MARKET  
RESPONSES TO ACTUARIAL INQUIRY 3, DATED JUNE 3, 2022  
Question 5

	Plan	Inforce Contracts				Projected Contracts			
		Single Rate	Couple Rate	Adult and Child(ren) Rate	Family Rate	Single Rate	Couple Rate	Adult and Child(ren) Rate	Family Rate
NON-STANDARD PLANS	Vermont Preferred Gold	479	142	18	62	479	142	18	62
	Vermont Select Gold CDHP	517	183	26	120	517	183	26	120
	Vermont Preferred Silver	833	208	17	33	1,198	312	27	55
	Vermont Select Silver CDHP	274	82	4	21	408	120	8	29
	Vermont Preferred Bronze	267	49	11	31	267	49	11	31
	Vermont Select Bronze CDHP	607	156	18	95	607	156	18	95
STANDARD PLANS	Standard Platinum	699	204	53	108	699	204	53	108
	Standard Gold	596	201	32	112	596	201	32	112
	Standard Silver	1,333	420	44	91	2,006	613	62	130
	Standard Silver CDHP	311	79	11	36	471	125	15	46
	Standard Bronze	455	104	11	51	455	104	11	51
	Standard Bronze CDHP	319	76	14	57	319	76	14	57
	Standard Bronze Integrated	284	47	7	29	284	47	7	29
Catastrophic	233	1	0	0	233	1	0	0	
REFLECTIVE PLANS	Vermont Preferred Silver - Reflective	111	22	5	26	111	22	5	26
	Vermont Select Silver CDHP - Reflective	93	23	4	18	93	23	4	18
	Standard Silver - Reflective	301	62	27	85	301	62	27	85
	Standard Silver CDHP - Reflective	74	20	7	22	74	20	7	22
<b>Total</b>		<b>11,171</b>				<b>12,999</b>			

BLUE CROSS AND BLUE SHIELD OF VERMONT  
2023 VERMONT ACA MARKET RATE FILINGS

CONSUMER ADJUSTED PREMIUM RATES - SMALL GROUP MARKET  
RESPONSES TO ACTUARIAL INQUIRY 3, DATED JUNE 3, 2022  
Question 5

	Plan	Plan Level Adjusted Index Rate	PMPM to Single Contract Conversion Factor	2023 Proposed Rates				2022 Approved Rates				2023 Proposed Rate Increases			
				Single Rate	Couple Rate	Adult and Child(ren) Rate	Family Rate	Single Rate	Couple Rate	Adult and Child(ren) Rate	Family Rate	Single Rate	Couple Rate	Adult and Child(ren) Rate	Family Rate
NON-STANDARD PLANS	Vermont Preferred Gold	\$697.74	1.1426	\$797.23	\$1,594.46	\$1,538.65	\$2,240.22	\$686.61	\$1,373.22	\$1,325.16	\$1,929.37	16.1%	16.1%	16.1%	16.1%
	Vermont Select Gold CDHP	\$712.21	1.1426	\$813.77	\$1,627.54	\$1,570.58	\$2,286.69	\$723.92	\$1,447.84	\$1,397.17	\$2,034.22	12.4%	12.4%	12.4%	12.4%
	Vermont Preferred Silver	\$579.46	1.1426	\$662.09	\$1,324.18	\$1,277.83	\$1,860.47	\$590.11	\$1,180.22	\$1,138.91	\$1,658.21	12.2%	12.2%	12.2%	12.2%
	Vermont Select Silver CDHP	\$582.53	1.1426	\$665.60	\$1,331.20	\$1,284.61	\$1,870.34	\$604.39	\$1,208.78	\$1,166.47	\$1,698.34	10.1%	10.1%	10.1%	10.1%
	Vermont Preferred Bronze	\$518.23	1.1426	\$592.13	\$1,184.26	\$1,142.81	\$1,663.89	\$522.54	\$1,045.08	\$1,008.50	\$1,468.34	13.3%	13.3%	13.3%	13.3%
	Vermont Select Bronze CDHP	\$512.64	1.1426	\$585.74	\$1,171.48	\$1,130.48	\$1,645.93	\$516.99	\$1,033.98	\$997.79	\$1,452.74	13.3%	13.3%	13.3%	13.3%
STANDARD PLANS	Standard Platinum	\$876.78	1.1426	\$1,001.81	\$2,003.62	\$1,933.49	\$2,815.09	\$882.05	\$1,764.10	\$1,702.36	\$2,478.56	13.6%	13.6%	13.6%	13.6%
	Standard Gold	\$733.07	1.1426	\$837.60	\$1,675.20	\$1,616.57	\$2,353.66	\$741.08	\$1,482.16	\$1,430.28	\$2,082.43	13.0%	13.0%	13.0%	13.0%
	Standard Silver	\$588.20	1.1426	\$672.07	\$1,344.14	\$1,297.10	\$1,888.52	\$611.36	\$1,222.72	\$1,179.92	\$1,717.92	9.9%	9.9%	9.9%	9.9%
	Standard Silver CDHP	\$620.93	1.1426	\$709.48	\$1,418.96	\$1,369.30	\$1,993.64	\$637.01	\$1,274.02	\$1,229.43	\$1,790.00	11.4%	11.4%	11.4%	11.4%
	Standard Bronze	\$509.18	1.1426	\$581.79	\$1,163.58	\$1,122.85	\$1,634.83	\$516.08	\$1,032.16	\$996.03	\$1,450.18	12.7%	12.7%	12.7%	12.7%
	Standard Bronze CDHP	\$525.86	1.1426	\$600.85	\$1,201.70	\$1,159.64	\$1,688.39	\$530.38	\$1,060.76	\$1,023.63	\$1,490.37	13.3%	13.3%	13.3%	13.3%
	Standard Bronze Integrated	\$524.04	1.1426	\$598.77	\$1,197.54	\$1,155.63	\$1,682.54	\$523.08	\$1,046.16	\$1,009.54	\$1,469.85	14.5%	14.5%	14.5%	14.5%
REFLECTIVE PLANS	Vermont Preferred Silver - Reflective	\$579.46	1.1426	\$662.09	\$1,324.18	\$1,277.83	\$1,860.47	\$590.43	\$1,180.86	\$1,139.53	\$1,659.11	12.1%	12.1%	12.1%	12.1%
	Vermont Select Silver CDHP - Reflective	\$581.73	1.1426	\$664.69	\$1,329.38	\$1,282.85	\$1,867.78	\$603.66	\$1,207.32	\$1,165.06	\$1,696.28	10.1%	10.1%	10.1%	10.1%
	Standard Silver - Reflective	\$588.19	1.1426	\$672.07	\$1,344.14	\$1,297.10	\$1,888.52	\$611.47	\$1,222.94	\$1,180.14	\$1,718.23	9.9%	9.9%	9.9%	9.9%
	Standard Silver CDHP - Reflective	\$620.89	1.1426	\$709.43	\$1,418.86	\$1,369.20	\$1,993.50	\$637.05	\$1,274.10	\$1,229.51	\$1,790.11	11.4%	11.4%	11.4%	11.4%
<b>Total</b>				<b>\$167,395,081</b>				<b>\$148,794,531</b>				<b>12.501%</b>			

BLUE CROSS AND BLUE SHIELD OF VERMONT  
2023 VERMONT ACA MARKET RATE FILINGS

CONSUMER ADJUSTED PREMIUM RATES - SMALL GROUP MARKET  
RESPONSES TO ACTUARIAL INQUIRY 3, DATED JUNE 3, 2022  
Question 5

	Plan	Inforce Contracts				Projected Contracts			
		Single Rate	Couple Rate	Adult and Child(ren) Rate	Family Rate	Single Rate	Couple Rate	Adult and Child(ren) Rate	Family Rate
NON-STANDARD PLANS	Vermont Preferred Gold	332	46	22	70	342	49	23	73
	Vermont Select Gold CDHP	943	401	110	447	994	415	114	461
	Vermont Preferred Silver	0	0	0	0	0	0	0	0
	Vermont Select Silver CDHP	0	0	0	0	0	0	0	0
	Vermont Preferred Bronze	131	18	5	18	134	19	5	19
	Vermont Select Bronze CDHP	332	73	19	84	344	76	20	87
STANDARD PLANS	Standard Platinum	1,230	434	137	412	1,284	449	141	426
	Standard Gold	935	255	77	220	968	264	80	229
	Standard Silver	0	0	0	0	0	0	0	0
	Standard Silver CDHP	0	0	0	0	0	0	0	0
	Standard Bronze	321	56	24	60	330	59	25	63
	Standard Bronze CDHP	248	54	12	61	256	56	13	63
	Standard Bronze Integrated	83	8	2	15	85	9	2	16
REFLECTIVE PLANS	Vermont Preferred Silver - Reflective	279	44	15	42	286	46	16	44
	Vermont Select Silver CDHP - Reflective	351	150	27	162	369	155	28	167
	Standard Silver - Reflective	1,245	280	70	194	1,281	290	73	204
	Standard Silver CDHP - Reflective	457	114	31	121	474	119	32	126
<b>Total</b>		<b>11,277</b>				<b>11,703</b>			

BLUE CROSS AND BLUE SHIELD OF VERMONT  
2023 VERMONT ACA MARKET RATE FILINGS

CONSUMER ADJUSTED PREMIUM RATES - COMBINED MARKET  
RESPONSES TO ACTUARIAL INQUIRY 3, DATED JUNE 3, 2022  
Question 5

	Plan	Plan Level Adjusted Index Rate	PMPM to Single Contract Conversion Factor	2023 Proposed Rates				2022 Approved Rates				2023 Proposed Rate Increases				
				Single Rate	Couple Rate	Adult and Child(ren) Rate	Family Rate	Single Rate	Couple Rate	Adult and Child(ren) Rate	Family Rate	Single Rate	Couple Rate	Adult and Child(ren) Rate	Family Rate	
INDIVIDUAL	NON-STANDARD PLANS	Vermont Preferred Gold	1.1096	\$845.74	\$1,691.48	\$1,632.28	\$2,376.53	\$775.41	\$1,550.82	\$1,496.54	\$2,178.90	9.1%	9.1%	9.1%	9.1%	
		Vermont Select Gold CDHP	1.1096	\$863.81	\$1,727.62	\$1,667.15	\$2,427.31	\$819.61	\$1,639.22	\$1,581.85	\$2,303.10	5.4%	5.4%	5.4%	5.4%	
		Vermont Preferred Silver	1.1096	\$726.68	\$1,612.64	\$1,556.20	\$2,265.76	\$757.46	\$1,514.92	\$1,461.90	\$2,128.46	6.5%	6.5%	6.5%	6.5%	
		Vermont Select Silver CDHP	1.1096	\$802.27	\$1,604.54	\$1,548.38	\$2,254.38	\$760.89	\$1,521.78	\$1,468.52	\$2,138.10	5.4%	5.4%	5.4%	5.4%	
		Vermont Preferred Bronze	1.1096	\$560.56	\$1,243.98	\$1,200.44	\$1,747.79	\$580.80	\$1,161.60	\$1,120.94	\$1,632.05	7.1%	7.1%	7.1%	7.1%	
		Vermont Select Bronze CDHP	1.1096	\$554.21	\$1,229.90	\$1,186.85	\$1,728.01	\$574.06	\$1,148.12	\$1,107.94	\$1,613.11	7.1%	7.1%	7.1%	7.1%	
	STANDARD PLANS	Standard Platinum	1.1096	\$1,069.13	\$2,138.26	\$2,063.42	\$3,004.26	\$1,007.86	\$2,015.72	\$1,945.17	\$2,832.09	6.1%	6.1%	6.1%	6.1%	
		Standard Gold	1.1096	\$889.92	\$1,779.84	\$1,717.55	\$2,500.68	\$840.45	\$1,680.90	\$1,622.07	\$2,361.66	5.9%	5.9%	5.9%	5.9%	
		Standard Silver	1.1096	\$732.26	\$1,625.02	\$1,568.14	\$2,283.15	\$772.90	\$1,545.80	\$1,491.70	\$2,171.85	5.1%	5.1%	5.1%	5.1%	
		Standard Silver CDHP	1.1096	\$752.65	\$1,670.28	\$1,611.82	\$2,346.74	\$789.15	\$1,578.30	\$1,523.06	\$2,217.51	5.8%	5.8%	5.8%	5.8%	
		Standard Bronze	1.1096	\$550.30	\$1,221.22	\$1,178.48	\$1,715.81	\$573.09	\$1,146.18	\$1,106.06	\$1,610.38	6.5%	6.5%	6.5%	6.5%	
		Standard Bronze CDHP	1.1096	\$568.99	\$1,262.70	\$1,218.51	\$1,774.09	\$590.11	\$1,180.22	\$1,138.91	\$1,658.21	7.0%	7.0%	7.0%	7.0%	
		Standard Bronze Integrated	1.1096	\$567.12	\$1,258.56	\$1,214.51	\$1,768.28	\$581.47	\$1,162.94	\$1,122.24	\$1,633.93	8.2%	8.2%	8.2%	8.2%	
	Catastrophic	1.0020	\$247.31	\$494.62	\$477.31	\$694.94	\$234.15	\$468.30	\$451.91	\$657.96	5.6%	5.6%	5.6%	5.6%		
	REFLECTIVE PLANS	Vermont Preferred Silver - Reflective	1.1096	\$629.38	\$1,396.72	\$1,347.83	\$1,962.39	\$661.16	\$1,322.32	\$1,276.04	\$1,857.86	5.6%	5.6%	5.6%	5.6%	
		Vermont Select Silver CDHP - Reflective	1.1096	\$631.87	\$1,402.24	\$1,353.16	\$1,970.15	\$676.96	\$1,353.92	\$1,306.53	\$1,902.26	3.6%	3.6%	3.6%	3.6%	
		Standard Silver - Reflective	1.1096	\$639.19	\$1,418.50	\$1,368.85	\$1,992.99	\$686.40	\$1,372.80	\$1,324.75	\$1,928.78	3.3%	3.3%	3.3%	3.3%	
		Standard Silver CDHP - Reflective	1.1096	\$675.96	\$1,500.10	\$1,447.60	\$2,107.64	\$716.84	\$1,433.68	\$1,383.50	\$2,014.32	4.6%	4.6%	4.6%	4.6%	
	SMALL GROUP	NON-STANDARD PLANS	Vermont Preferred Gold	1.1096	\$845.74	\$1,691.48	\$1,632.28	\$2,376.53	\$686.61	\$1,373.22	\$1,325.16	\$1,929.37	23.2%	23.2%	23.2%	23.2%
Vermont Select Gold CDHP			1.1096	\$863.81	\$1,727.62	\$1,667.15	\$2,427.31	\$723.92	\$1,447.84	\$1,397.17	\$2,034.22	19.3%	19.3%	19.3%	19.3%	
Vermont Preferred Silver			1.1096	\$726.68	\$1,612.64	\$1,556.20	\$2,265.76	\$590.11	\$1,180.22	\$1,138.91	\$1,658.21	36.6%	36.6%	36.6%	36.6%	
Vermont Select Silver CDHP			1.1096	\$802.27	\$1,604.54	\$1,548.38	\$2,254.38	\$604.39	\$1,208.78	\$1,166.47	\$1,698.34	32.7%	32.7%	32.7%	32.7%	
Vermont Preferred Bronze			1.1096	\$560.56	\$1,243.98	\$1,200.44	\$1,747.79	\$522.54	\$1,045.08	\$1,008.50	\$1,468.34	19.0%	19.0%	19.0%	19.0%	
Vermont Select Bronze CDHP			1.1096	\$554.21	\$1,229.90	\$1,186.85	\$1,728.01	\$516.99	\$1,033.98	\$997.79	\$1,452.74	18.9%	18.9%	18.9%	18.9%	
STANDARD PLANS		Standard Platinum	1.1096	\$1,069.13	\$2,138.26	\$2,063.42	\$3,004.26	\$882.05	\$1,764.10	\$1,702.36	\$2,478.56	21.2%	21.2%	21.2%	21.2%	
		Standard Gold	1.1096	\$889.92	\$1,779.84	\$1,717.55	\$2,500.68	\$741.08	\$1,482.16	\$1,430.28	\$2,082.43	20.1%	20.1%	20.1%	20.1%	
		Standard Silver	1.1096	\$732.26	\$1,625.02	\$1,568.14	\$2,283.15	\$611.36	\$1,222.72	\$1,179.92	\$1,717.92	32.9%	32.9%	32.9%	32.9%	
		Standard Silver CDHP	1.1096	\$752.65	\$1,670.28	\$1,611.82	\$2,346.74	\$637.01	\$1,274.02	\$1,229.43	\$1,790.00	31.1%	31.1%	31.1%	31.1%	
		Standard Bronze	1.1096	\$550.30	\$1,221.22	\$1,178.48	\$1,715.81	\$516.08	\$1,032.16	\$996.03	\$1,450.18	18.3%	18.3%	18.3%	18.3%	
		Standard Bronze CDHP	1.1096	\$568.99	\$1,262.70	\$1,218.51	\$1,774.09	\$530.38	\$1,060.76	\$1,023.63	\$1,490.37	19.0%	19.0%	19.0%	19.0%	
		Standard Bronze Integrated	1.1096	\$567.12	\$1,258.56	\$1,214.51	\$1,768.28	\$523.08	\$1,046.16	\$1,009.54	\$1,469.85	20.3%	20.3%	20.3%	20.3%	
REFLECTIVE PLANS		Vermont Preferred Silver - Reflective	1.1096	\$629.38	\$1,396.72	\$1,347.83	\$1,962.39	\$590.43	\$1,180.86	\$1,139.53	\$1,659.11	18.3%	18.3%	18.3%	18.3%	
		Vermont Select Silver CDHP - Reflective	1.1096	\$631.87	\$1,402.24	\$1,353.16	\$1,970.15	\$603.66	\$1,207.32	\$1,165.06	\$1,696.28	16.1%	16.1%	16.1%	16.1%	
		Standard Silver - Reflective	1.1096	\$639.19	\$1,418.50	\$1,368.85	\$1,992.99	\$611.47	\$1,222.94	\$1,180.14	\$1,718.23	16.0%	16.0%	16.0%	16.0%	
		Standard Silver CDHP - Reflective	1.1096	\$675.96	\$1,500.10	\$1,447.60	\$2,107.64	\$637.05	\$1,274.10	\$1,229.51	\$1,790.11	17.7%	17.7%	17.7%	17.7%	
<b>Total</b>							<b>\$345,783,569</b>				<b>\$307,567,712</b>				<b>12.43%</b>	

BLUE CROSS AND BLUE SHIELD OF VERMONT  
2023 VERMONT ACA MARKET RATE FILINGS

CONSUMER ADJUSTED PREMIUM RATES - COMBINED MARKET  
RESPONSES TO ACTUARIAL INQUIRY 3, DATED JUNE 3, 2022  
Question 5

	Plan	Inforce Contracts				Projected Contracts				
		Single Rate	Couple Rate	Adult and Child(ren) Rate	Family Rate	Single Rate	Couple Rate	Adult and Child(ren) Rate	Family Rate	
INDIVIDUAL	NON-STANDARD PLANS	Vermont Preferred Gold	479	142	18	62	479	142	18	62
		Vermont Select Gold CDHP	517	183	26	120	517	183	26	120
		Vermont Preferred Silver	833	208	17	33	1,198	312	27	55
		Vermont Select Silver CDHP	274	82	4	21	408	120	8	29
		Vermont Preferred Bronze	267	49	11	31	267	49	11	31
	Vermont Select Bronze CDHP	607	156	18	95	607	156	18	95	
	STANDARD PLANS	Standard Platinum	699	204	53	108	699	204	53	108
		Standard Gold	596	201	32	112	596	201	32	112
		Standard Silver	1,333	420	44	91	2,006	613	62	130
		Standard Silver CDHP	311	79	11	36	471	125	15	46
		Standard Bronze	455	104	11	51	455	104	11	51
		Standard Bronze CDHP	319	76	14	57	319	76	14	57
		Standard Bronze Integrated	284	47	7	29	284	47	7	29
	Catastrophic	233	1	0	0	233	1	0	0	
	REFLECTIVE PLANS	Vermont Preferred Silver - Reflective	111	22	5	26	111	22	5	26
Vermont Select Silver CDHP - Reflective		93	23	4	18	93	23	4	18	
Standard Silver - Reflective		301	62	27	85	301	62	27	85	
Standard Silver CDHP - Reflective	74	20	7	22	74	20	7	22		
SMALL GROUP	NON-STANDARD PLANS	Vermont Preferred Gold	332	46	22	70	342	49	23	73
		Vermont Select Gold CDHP	943	401	110	447	994	415	114	461
		Vermont Preferred Silver	0	0	0	0	0	0	0	0
		Vermont Select Silver CDHP	0	0	0	0	0	0	0	0
		Vermont Preferred Bronze	131	18	5	18	134	19	5	19
		Vermont Select Bronze CDHP	332	73	19	84	344	76	20	87
	STANDARD PLANS	Standard Platinum	1,230	434	137	412	1,284	449	141	426
		Standard Gold	935	255	77	220	968	264	80	229
		Standard Silver	0	0	0	0	0	0	0	0
		Standard Silver CDHP	0	0	0	0	0	0	0	0
		Standard Bronze	321	56	24	60	330	59	25	63
		Standard Bronze CDHP	248	54	12	61	256	56	13	63
		Standard Bronze Integrated	83	8	2	15	85	9	2	16
	REFLECTIVE PLANS	Vermont Preferred Silver - Reflective	279	44	15	42	286	46	16	44
		Vermont Select Silver CDHP - Reflective	351	150	27	162	369	155	28	167
Standard Silver - Reflective		1,245	280	70	194	1,281	290	73	204	
Standard Silver CDHP - Reflective		457	114	31	121	474	119	32	126	

Total

22,448

24,702

BLUE CROSS AND BLUE SHIELD OF VERMONT  
2023 VERMONT ACA MARKET RATE FILINGS

STATE OF VERMONT STANDARD PLAN DESIGNS  
RESPONSES TO ACTUARIAL INQUIRY 3, DATED JUNE 3, 2022

Question 9

<b>Breakdown of the reasons for rate increase</b>			
<b>Reasons for Rate Increase</b>	<b>Individual Market</b>	<b>Small Group Market</b>	<b>Number of Detailed Reasons</b>
Restated Adjusted CY 2021 – Medical Inpatient Facility	100.5%	97.0%	1
Restated Adjusted CY 2021 – Medical Outpatient Facility	103.1%	103.5%	1
Restated Adjusted CY 2021 – Medical Professional	101.7%	101.2%	1
Restated Adjusted CY 2021 – Medical Pharmaceuticals	96.5%	99.6%	1
Restated CY 2021 – Retail Pharmacy Non-Specialty	100.1%	100.7%	1
Restated CY 2021 – Retail Pharmacy Specialty	99.9%	99.3%	1
Restated CY 2021 – Vision and Dental	100.0%	100.0%	1
FWA and Cost Containment Programs – Removal of increased activities in CY 2021	100.5%	100.5%	1
Non-System Claims, except Pharmacy Rebates – Impact of the change in expected costs	100.2%	100.2%	1
Demographics – Change in expected 2021 to 2022	99.9%	100.1%	1
Demographics – Impact of the projection to 2022	99.3%	100.2%	1
Pool Morbidity – Impact of the Canceled Members	99.6%	98.1%	1
Pool Morbidity – Impact of the newly insured due to ARPA	99.9%	100.0%	1
Inforce Member Mix by Plan – Impact of reflecting projected 2023 membership by plan	101.0%	100.2%	1
Risk Adjustment – Updated projected transfer	98.6%	99.2%	1
HCRP charge – Change in the amount of the charge	100.1%	100.2%	1
High Cost Claimant – Change in expected cost from 2022 Filing to 2023 Filing	99.9%	100.0%	1
<b>Total Impact the overall change to 2022 rates due to experience and population changes</b>	<b>100.6%</b>	<b>99.9%</b>	<b>17</b>
Impacts of Trend - Restatement of 2021 to 2022 and additional year of trend	113.2%	112.3%	25
Benefits - Plan Designs, AV, Silver Loading, and induced utilization	99.3%	100.3%	7
Administrative Costs	100.1%	100.8%	5
Regulatory Requirements	100.5%	100.5%	8
Premium Mitigation Programs - Vermont Blue Rx, Civica, FWA Programs	98.7%	98.7%	5
<b>Total Rate Increase</b>	<b>112.3%</b>	<b>112.5%</b>	<b>67</b>