

STATE OF VERMONT
GREEN MOUNTAIN CARE BOARD

In re: Blue Cross Blue Shield of Vermont)
Individual and Small Group Filing) GMCB-005-20rr

HCA RESPONSE TO HOSPITAL BUDGET SUBMISSIONS

Vermonters with individual and small group plans are unable to afford a rate increase this year, as the Office of the Health Care Advocate demonstrated in our post-hearing memorandum for this filing. We understand that the Green Mountain Care Board (Board) is in a difficult position. The Board is trying to make sure that the hospitals have the money they need to keep providing services and that premiums and out-of-pocket costs are not so expensive that Vermonters cannot afford to access care. A thorough analysis of the hospitals' budgets, including the government relief dollars the hospitals have received, is necessary before making any assumptions related to the need for significant hospital commercial rate increases. Yet, the hospitals' requests for more money do not change the terrible situation Vermonters are in and the fact that they cannot afford to pay more for health care and health insurance.

As the Board is aware, the qualified health plans are the only option for Vermonters who do not have employer or government-provided insurance and often the only option for small Vermont businesses. It is essential that these plans are as affordable as possible, because these two groups are Vermont's most financially vulnerable commercially insured populations.

If the Board chooses to approve substantial commercial rate increases for any hospitals for 2021, we ask that these increases not be applied to the individual and small group plans to ensure that a 0% premium rate increase for these plans remains feasible. As we have repeatedly stated, Vermonters are suffering through a public health and financial crisis. Implementing lower

hospital commercial rate caps for individual and small group plans than for other commercial populations may be a necessary and rational means for the Board to meet the dual goals of affordability for Vermont's most vulnerable commercial population and solvency for Vermont's hospitals. As such, we continue to ask the Board to approve a 0% premium rate increase for individual and small groups.

Dated at Montpelier, Vermont this 5th Day of August, 2020.

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CERTIFICATE OF SERVICE

I, Eric Schultheis, hereby certify that I have served the above HCA Response to Green Mountain Care Board Hearing Question on Michael Barber, Green Mountain Care Board General Counsel; Amerin Aborjaily, Green Mountain Care Board Staff Attorney; and Mike Donofrio and Brigid Asay, representatives of BCBSVT in the above-captioned matter, by electronic mail, return receipt requested, this 5th Day of August, 2020.

s/ Eric Schultheis

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