

STATE OF VERMONT
GREEN MOUNTAIN CARE BOARD

In re:)
BCBSVT 2022 Individual Group VHC Filing) GMCB-005-21rr
BCBSVT 2022 Small Group VHC Filing) GMCB-006-21rr

HCA Objection to BCBSVT Non-Responsive Answer to HCA Actuarial Question 1

Dear Mr. Barber and Ms. Beliveau:

In L&E's June 19, 2021, letter to Blue Cross Blue Shield of Vermont (BCBSVT), you were kind enough to submit to BCBSVT the following question (Question), suggested by the Office of the Health Care Advocate (HCA):

"Provide the 2020 and projected claims data requested by the Office of the Health Care Advocate in question #1 of the proposed questions it submitted to the Board on June 7, 2021 . . ."

The Question contained the following specific instructions:

"Substitute, in the Projected Claims Table, the projected paid claims for 2020 of \$339,991,579 with the actual paid claims for 2020";

and

"Substitute, in the Projected Claims Table, the 2021 projected paid claims with the amount of claims BCBSVT currently projects for 2021 . . ."

BCBSVT did not answer the Question. In its June 25, 2021 letter to Kevin Ruggeberg purporting to respond to the Green Mountain Care Board's (Board) question, BCBSVT declined to disclose either its 2020 actual paid claims or it currently projected claims for 2021. BCBSVT referred to updated modeling it has done, but nowhere either in its June 25, 2021 response letter or in any document that letter refers to does it disclose its 2020 actual paid claims or its projected claims for 2021.

The Board and the HCA are entitled to know the amounts that were requested in the Question, both because they are relevant to the question of whether BCBSVT's proposed rates for 2022 comply with the statute, and because the extent and direction of any deviation between BCBSVT's projected paid claims and actual paid claims is relevant to BCBSVT's credibility.

The HCA believes that the hearing will proceed more efficiently, to the benefit of all parties, if BCBSVT timely responds in writing to the Question as posed in L&E's June 19, 2021 letter, and accordingly asks that the Board order BCBSVT to answer the Question. At the same time, the HCA is prepared to address this issue and question BCBSVT regarding this issue at the hearing.

Sincerely,

s/ Jay Angoff
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CERTIFICATE OF SERVICE

I, Eric Schultheis, hereby certify that I have served the above HCA Objection to BCBSVT Non-Responsive Answer to HCA Actuarial Question 1 on Michael Barber, Green Mountain Care Board General Counsel; Laura Beliveau, Green Mountain Care Board Staff Attorney; and Michael Donofrio and Bridget Asay, Stris and Maher LLP, representatives of Blue Cross Blue Shield of Vermont in the above-captioned matters, by electronic mail, delivery receipt requested, this 1st day of July, 2021.

s/ Eric Schultheis

Eric Schultheis

Staff Attorney

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