

**Green Mountain Care Board**  
144 State Street  
Montpelier, VT 05602

802-828-2177  
www.gmcboard.vermont.gov

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June 17, 2020

Mr. Paul A. Schultz, F.S.A., M.A.A.A.  
Chief Actuary  
BlueCross BlueShield of Vermont  
PO Box 186  
Montpelier, VT 05601-0186

**Re: Blue Cross Blue Shield of Vermont 2021 Large Group Filing (SERFF Tracking #: BCVT-131835151; GMCB Docket No. GMCB-002-20rr) and The Vermont Health Plan 2021 Large Group Filing (SERFF Tracking #: BCVT-131835292; GMCB Docket No. GMCB-003-20rr).**

Dear Mr. Schultz,

Pursuant to its authority under 8 V.S.A § 4062 and 18 V.S.A. § 9375(b)(6), the Green Mountain Care Board requests that Blue Cross Blue Shield of Vermont (BCBSVT) and The Vermont Health Plan (TVHP) provide the following additional information with respect to the above-referenced filings.

1. Affordable and accessible healthcare relies in part on a vibrant array of providers, including providers who are aligned with hospitals and others who are not. Yet, payment variation has been an on-going and contentious issue for a number of years. Certainly COVID-19 has shocked healthcare providers across the spectrum in Vermont and the ability to withstand this shock in part will depend on the financial health of providers prior to the onset of COVID-19.

Please provide an assessment of whether or not price variation exists across BCBSVT's and TVHP's Large Group provider networks such that providers of similar services are reimbursed at significantly different rates and, if they are, explain the factors that drive such differential reimbursement(s) (e.g., cost of underlying service, size of practice, hospital affiliation, payer mix, etc.). The assessment should be supported based on claims data from the 2019 Incurred Claims profiled on page 4 of the filing.

2. What efforts does BCBSVT take, if any, to reduce price variation?

This information is non-actuarial in nature and therefore has not been requested through SERFF.

When providing your responses, please copy the question in the same numbered format as in this document and provide your response immediately following. To ensure that the review of your filing has been completed before statutory deadlines, we expect you to respond as expeditiously as possible, but no later than the end of the day on Thursday, June 25, 2020.



Thank you in advance for your cooperation.

Sincerely,

*s/ Michael Barber*

Michael Barber  
General Counsel  
Green Mountain Care Board

cc: Kaili Kuiper, Esq., HCA  
Eric Schultheis, Esq., HCA  
Amerin Aborjaily, Esq., GMCB  
Thomas Crompton, GMCB  
Christina McLaughlin, GMCB

