

### Guidance on Silver Loading

The Green Mountain Care Board (Board) is providing new guidance regarding its review of premiums for qualified health plans offered in the individual market. The guidance relates to the calculation of the “CSR Load,” which increases On-Exchange Silver plan premiums to account for the reduced member cost sharing required by the Affordable Care Act (i.e., CSR). The guidance applies to all issuers in the individual market with respect to coverage years 2025 and later.

Issuers must initially calculate a Pricing AV for each plan, reflective only of the Base Silver benefits. To reflect the additional benefits provided by CSR variants, the Pricing AV for On-Exchange Silver plans should then be multiplied by the CSR Load provided by the Board in advance of the filing deadline. This factor will be calculated as follows:

- In mid-February, when issuers submit their January enrollment information to the Department of Vermont Health Access, they will provide the Board with the January counts of enrolled members in Silver plans by CSR variant, as well as AI/AN members enrolled in 100% CSR plans.
- The Board will calculate the distribution of membership across these CSR levels.
- To calculate the CSR load, “the numerator” will be the weighted average, using only the 87%, 94%, and 100% AV plans’ enrollment, of the “Total Factor” from the table below, which multiplies the actuarial value by the induced demand factor.

Cohort	Actuarial Value	Induced Factor	Demand	Total Factor
Base Silver	0.70	1.03		0.7210
87% CSR	0.87	1.15		1.0005
94% CSR	0.94	1.15		1.0810
100% CSR	1.00	1.15		1.1500

- Finally, the numerator will be divided by the Base Silver “Total Factor” of 0.7210 to calculate the CSR Load multiplier applicable to On-Exchange Silver plans.

The multiplier will be provided to issuers on or before April 1 of each year for use by the issuers in their rate development.

Effective Date: March 8, 2024

