

STATE OF VERMONT
GREEN MOUNTAIN CARE BOARD

In re: Blue Cross and Blue Shield of Vermont) GMCB-004-24rr
2025 Individual Market Rate Filing)
) SERFF No. BCVT-134091560
)

In re: Blue Cross and Blue Shield of Vermont) GMCB-003-24rr
2025 Small Group Market Rate Filing)
) SERFF No.: BCVT-134096633
)

Dear Mr. Donofrio and Ms. Asay,

The Green Mountain Care Board (GMCB) hereby requests that Blue Cross and Blue Shield of Vermont (BCBSVT) provide the following information to assist with the review of the above-referenced filings. Please provide responses no later than August 1, 2024.

1. How is the higher-than-expected utilization thus far in 2024 distributed across hospitals (VT and NH border hospitals)? Is BCBSVT seeing a similar surge at non-GMCB-regulated facilities?
2. Page 18 of Exhibit 19 describes “modest savings” to date from the affiliation with BCBSM. Quantify these savings and the impact on rates. Also explain when BCBSVT expects to “transition [its] technology and systems” and quantify the “substantial expenditures on technology” that BCBSVT expects to forego as a result of the transition.
3. Provide a breakdown of each Vermont hospital’s commercial rate commitments over the past five years, whether those commitments were exceeded, and, for each commitment that was exceeded, whether relief was granted by the hospital.
4. What percentage of BCBSVT’s medical costs in the individual and small group lines of business are associated with care provided at UVMHN hospitals?
5. Provide a chart showing what proportion of the trend for GMCB-regulated facilities is associated with changes in utilization, price, and intensity at each facility. Is BCBSVT seeing similar patterns at non-GMCB-regulated facilities?
6. Describe how this year’s proposed rate increases are likely to affect BCBSVT’s enrollment and how these enrollment changes may impact BCBSVT’s RBC.
7. Does BCBSVT waive prior authorization for low-cost providers other than Vermont Open MRI?

8. Has BCBSVT reviewed available price transparency data to compare its reimbursement rates for VT and border NH hospitals with the reimbursement rates of national carriers such as Cigna and United. If not, why not? If so, please share the results of the comparison.
9. Is BCBSVT seeing members “buy down” in benefits due to high premium increases in recent years? In the small group market, does BCBSVT have any insight into whether employers are shifting more of the premium cost onto their employees?
10. With respect to page 14 of Ex. 12, what assumptions were made in BCBSVT’s RBC modeling regarding gains or losses of the Vermont Blue Advantage business?
11. With respect to table on page 8 of Ex. 12, what are the years of data underlying the rankings and what are the orders of magnitude of difference between hospitals.
12. In the past 5 years, has BCBSVT negotiated a different increase for any GMCB-regulated hospital than the cap allowed by the Board (up or down)? If so, provide details.
13. How is BCBSVT factoring quality into its negotiations with providers?

Dated: July 25, 2024.

Sincerely,

s/ Michael Barber

Michael Barber

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