

### **Guidance on Silver Loading**

This document outlines requirements for issuers offering health benefit plans in the individual market in Vermont and is intended to ensure compliance with 45 CFR 156.80(d)(2).

Issuers are restricted to the allowable factors in 45 CFR 156.80(d)(2) to adjust the Market Adjusted Index Rate to calculate each Plan Adjusted Index Rate. The Unified Rate Review Instructions should be followed for all allowable rating factors. The Green Mountain Care Board is implementing stricter guidance on the allowable adjustment for “actuarial value and cost-sharing design of the plan.” Beginning with coverage year 2024, each issuer must calculate Pricing Actuarial Values for On-Exchange Silver plans that are:

- based on the combined experience of all the issuer’s individual market plans, consistent with the other metal tiers, and
- calculated using the weighted average benefit richness of Silver members, inclusive of the issuer’s CSR-adjusted benefits.

Effective Date: March 15, 2023.