



Office of the Health Care Advocate
264 North Winooski Ave., Burlington VT 05401
Toll Free Hotline: 800-917-7787
www.vtlawhelp.org/health ■ Fax: 802-863-7152

BY EMAIL ONLY

June 30, 2023

Michael Barber
General Counsel, Green Mountain Care Board
Laura Beliveau
Staff Attorney, Green Mountain Care Board
144 State Street
Montpelier, VT 05602

RE: Implementation of the Board's Guidance on Silver Loading

Mr. Barber and Ms. Beliveau:

The HCA shares BCBSVT's concerns about the impact on Vermonters of the asymmetrical implementation of the Board's silver loading guidance. Likewise, we request that the Board select a methodology for silver loading and require both carriers to implement it consistently.

In implementing the Silver loading guidance, the intention was to raise the value of the benchmark plan, thereby enabling consumers in the individual market to draw down additional federal subsidies. With the additional subsidies, the assumption was that many consumers would buy up to Gold plans, while others might drop metal levels due to the increased silver load.

By assuming no movement among metal levels, MVP's approach to silver loading has the effect of suppressing the value of the benchmark plan. Indeed, our own internal analysis shows that Vermonters will gain no additional buying power if the presumed 2024 benchmark plan maintains its current pricing.

Furthermore, as counsel for BCBSVT point out in their letter, while gaining no additional buying power, BCBSVT members will end up paying for a larger silver load. In fact, our own calculations show that while on-Exchange Silver plans across

carriers generally had a price differential of less than 1% in 2023, in 2024 that price differential will increase to roughly 7%, to the detriment of BCBSVT members.

For these reasons, we ask the Board to require that both carriers implement the Silver loading guidance in a consistent manner. Like BCBSVT we also agree that BCBSVT's approach, which assumes member movement among metal levels, is most consistent with the policy goals of the Board's guidance.

Respectfully,

/s/ Charles Becker

Charles Becker
Staff Attorney

/s/ Eric Schultheis

Eric Schultheis
Staff Attorney

cc: Bridget Asay and Michael Donofrio, Counsel for BCBSVT
Martine Lemieux