

2024 Individual & Small Group Filings  
Written Comments Submitted to the Green Mountain Care Board  
May 5, 2022 through July 24, 2023

## GMCB Public Comments regarding 2023 Health Insurance Rate Review

**Name:** Brian Garvey

**Date:** 5/30/2023

**Affiliation:**

**Town/City:** St. Johnsbury

**Topic:** Health Insurance Rate Review

**Comment:** Dear Chair Foster and Members of the Green Mountain Care Board, The request by the Vermont hospitals to ignore established budget guidance and seek a collective \$87 million increase is extremely troubling. BCBSVT indicated in its most recent rate filing that 2/3 of its 14.5% requested increase is the result of increased hospital costs - this is before any further increase in hospital costs is considered. Vermont businesses and their employees cannot continue to bare these costs, particularly, if they continue to increase with no guard rails in place. These escalating costs prevent us from reinvesting in our business - impeding our ability to grow and increase our workforce. We've struggled to hang on this long by examining every opportunity to reduce costs and administrative overhead – continually adjusting to the changing landscape of our market. We have been committed to this because we value our employees and know how important health insurance is to their financial security and peace of mind. We respectfully request that the GMCB exercise its full authority to limit any increase in hospital costs and require them to adjust to their market.

**Post Comment:** Yes

**Name:** Anne Mollo

**Date:** 5/31/2023 **Affiliation:**

**Town/City:** Charlotte

**Topic:** Health Insurance Rates

**Comment:** I'm compelled to write to you. My understanding is that you are responsible for setting reimbursement rates throughout Vermont. In less than one week, I have just heard notice of the third family practice doctor leaving primary care in Vermont. Two plan to switch to specialty practice. One is simply leaving Vermont altogether to practice family care in another state. \*All three have indicated that their career changes are a direct result of your decisions.\* They have told me that reimbursement rates for family doctors with many years of experience are no different from doctors fresh out of medical school and internships, and overall the rates are unrealistically low and unsustainable. I've also learned that while these private practice doctors are being driven out, rates for UVM Medical Center doctors with the same practice and experience are granted much higher reimbursement rates. Bluntly, monopoly medical services do not benefit Vermont patients. They only benefit the monopoly business which has the advantage. Your decisions have harsh, real-world consequences. I and many other patients are now set adrift, with no acceptable recourse. Relationships we've built with our doctors over many years are falling away, and there are no primary care doctors rushing to fill that space. Why would they? I am left with urgent care, or emergency care, or no care at all—all of which can only cost my insurer and me far more—unless I'm willing to join the monopoly. Even then, I will be paying a premium for impersonal, substandard care. At the very best, I will have to rebuild a trusting relationship. For women in particular, this can be incredibly daunting, as we are not treated equally or with the privilege that men receive. I should count myself lucky that I'm not also BIPOC. I ask you to reconsider your policies on rate setting. You have the power to stem the tide of practitioners leaving family/primary care. Don't let lack of access to medical care become yet another reason people decide to leave Vermont and take their money and labor elsewhere.

**Post Comment:** Yes

**Name:** Nicole Kittell **Date:** 5/31/2023

**Affiliation:** frequently paying patient and benefits administrator for local construction company

**Town/City:** Williston

**Topic:** Hospital Budget & Insurance Rates

Comment: Dear Chair Foster and Members of the Green Mountain Care Board, The request by the Vermont hospitals to ignore established budget guidance and seek a collective \$87 million increase is extremely troubling. BCBSVT indicated in its most recent rate filing that 2/3 of its 14.5% requested increase is the result of increased hospital costs - this is before any further increase in hospital costs is considered. Vermont businesses and their employees cannot continue to bare these costs, particularly, if they continue to increase with no guard rails in place. These escalating costs prevent us from reinvesting in our business - impeding our ability to grow and increase our workforce. We've struggled to hang on this long by examining every opportunity to reduce costs and administrative overhead – continually adjusting to the changing landscape of our market. We have been committed to this because we value our employees and know how important health insurance is to their financial security and peace of mind. We respectfully request that the GMCB exercise its full authority to limit any increase in hospital costs and require them to adjust to their market.

**Post Comment:** Yes

**Name:** David Smalley

**Affiliation:**

**Town/City:** Manchester Center

**Topic:** Health Insurance Rate Review

**Comment:** my MVP individual silver plan premiums have increased almost 40% in the last two years. The change in the FY22 to FY 23 premium is 19.8%. I looked on the Green Mountain Care website at hospital budgets and obtained the following information:

Hospital Budgets FY23 M\$	FY23	FY22	Percent
Brattleboro	\$ 106	\$ 93	13%
UVM	\$ 1,659	\$ 1,508	10%
Southern VT Medical Center	\$ 189	\$ 177	6%
Springfield	\$ 59	\$ 55	8%
Rutland Regional Medical Center	\$ 314	\$ 270	16%
Porter	\$ 106	\$ 95	11%
Northeastern Vermont Regional Hospital	\$ 110	\$ 97	13%
Northwestern Medical Center	\$ 121	\$ 116	5%
Total	\$ 2,662	\$ 2,412	10%

Has MVP been authorized to increase the individual silver plan premiums by 19.8 % from FY22 to FY23?. Also, was MVP authorized for the same percentage increase in 2021 for individual premiums from FY21 to FY22?

If these premium increases have been approved, why would the Green Mountain Care Board allow premium increases in FY23 which are double the rate of growth in hospital spending? Moreover, if these increases in premiums are correct, why would the Green Mountain Care Board approve hospital spending increases of over 31% or 600m\$ in the last two years when, by the Vermont census, the population has only grown 2.8% in the last decade?.

Please confirm the approval of rate premiums and hospital spending. Thanks David

**Post Comment:** Yes

**Name:** Tammy

**Affiliation:**

**Town/City:** Manchester Center

**Topic:** Health Insurance Rate Review

**Comment:** I recently received my first bill from MVP Health Care for 2023. I was shocked to say the least! I had the same exact coverage last year and this year the increase is 24.5% more than last year! I called the Green Mtn Care Board and asked why this price increase was approved and I was told that there is more money available to help with this and I should speak with Vermont Health Connect for assistance. I called VHC only to find that I'm receiving the maximum amount! My premium is almost double of what I paid last year! I would love to know how anyone can justify a 24.5% increase! I have had serious health issues in the past, [REDACTED] and can't afford to take a chance with a less expensive policy. Shame on you for allowing this huge increase when times are already hard enough!

**Post Comment:** Yes

**Name:** Elizabeth D.C. Taylor

**Affiliation:** Provider paneled with BCBSVT (among others) at least for the time being

**Town/City:**

**Topic:** Health Insurance Rate Review

**Comment:**

Blue Cross Blue Shield of Vermont (BCBSVT) changed its policy regarding payment for psychological and neuropsychological testing as of March 1, 2023. This has had a detrimental impact on provider ability to offer appropriate evaluation services to patients who are insured through BCBSVT.

1. Referral for a adolescent ASD/ADHD. Behavior included deliberately hitting head against a wall. Evaluation for neuropsychological evaluation was denied. Upon appeal, three questions were asked and answered:

I. Does patient have known brain damage? Answer: Not known at this time. History of concussion without loss of consciousness, and headaches. (Use of the HRB would have helped answer this question.)

II. Has there been any other testing done for this diagnosis/concern? Answer: Referral is to ascertain ASD. Patient has diagnoses of (redacted). The purpose of the evaluation would be toward differential diagnosis, which will then guide treatment recommendations.

III. Is the evaluation being requested for therapy or education? Answer: Both, really. Based upon records, patient struggles with functioning in multiple environments, including but not limited to school. Testing was denied.

2. Referral for 8-year-old with suspected Autism Spectrum Disorder. Behavioral problems in multiple environments as well as struggling in school. Assessment would have included developmental history and clinical interview with family, cognitive testing, sensory interview with patient, developmental language and communication, adaptive behavioral functioning, and behavioral checklists. Denied. Appeal: denied.

3. Nurse practitioner contacted me asking if I were able to assess a young adult client for Autism. I explained that I had been getting denials from BCBSVT, and perhaps they could assist me with the pre-authorization process. They had no luck.

These are three examples of individuals dealing with psychiatric problems who will not receive appropriate diagnostic assessment due to BCBSVT's policies. Cognitive and neuropsychological assessment gives vital information clarifying an individual's current functioning and abilities. Diagnoses should never be based upon one-hour long interviews alone, which is what the BCBSVT model currently allows. Differential diagnosis is more complicated than checking off a list of self-reported symptoms. I would be more than happy to discuss this at length if given the opportunity.

**Post Comment:** Yes

**Name:** Terry Reil

**Affiliation:**

**Town/City:**

**Topic:** Health Insurance Rate Review

**Comment:**

Good afternoon. I am writing out of frustration with the health insurance here in Vermont. I lost my long term health insurance when I divorced. I missed the enrollment period to sign up for coverage so I spent many months uninsured and paying out of pocket. All the while I visited VT Health Connect many times to look at plans once the enrollment period arrived. As a person that is self-employed and a business that has been severely impacted from Covid and now the current economic inflation, the costs for these plans is outrageous. The only good thing about having declining business and income is it has made me eligible for premium assistance. I also learned that being uninsured, providers would significantly reduce their charges. I still cannot afford to pay them in full, but making payments on the smaller amounts is much more manageable.

Fast forward to Jan. 2023, I've enrolled for a plan and I'm receiving premium assistance. Unfortunately, the plan has a very high deductible and doesn't cover much of anything. And in addition, the reduced provider charges go away so I am now paying even more for my doctor visits. I'm trying my best to manage my health care and pay my bills. This system doesn't work for me. I was fearful that when I enrolled for an insurance plan, I would have to continue paying my bills and make a premium payment as nothing would be covered until I spent \$7K out of pocket. Now, because I have an insurance plan, the amount I pay is at a much higher rate. It has been a challenge to pay the reduced bills and now those charges almost double.

It seems my options are to switch to a plan with a much higher premium that has a much lower deductible, or to just continue paying out of pocket until I hit the deductible. Neither are great options for me financially right now. I could also drop the insurance plan and at least get the bills reduced as an uninsured person.

I understand none of you can directly help my situation but I think it's important for you to hear from people like me. I work hard, I try very hard to pay my bills on time. I cannot manage my health care and its cost with this system. I feel like the system is designed to harvest dollars and not take care of people. I would really like to see some mom and pop Vermonters on your board. People that have a hard time paying their bills, people that have to set up payment plans. This is just not sustainable. I may likely have to close my business and go back into the workforce to solve this problem.

There's a segment of us out here that are seemingly forgotten or not represented. Please take these words into consideration when doing your work. I appreciate what you do and understand how challenging it is. Thanks for listening.

**Post Comment:** Yes



**Name:** Gregory Rosenquist

**Affiliation:**

**Town/City:**

**Topic:** Health Insurance Rate Review

**Comment:** What was it that you proposed to United Healthcare that made them leave the UVM Healthcare Network? That really reduces my choices in Vermont. I am starting with a company and this is their only option for insurance. What is the solution here? Yet another reason to leave Vermont. There are few other alternatives in the area and the ones that are available are less than ideal. This is ridiculous.

**Post Comment:** Yes

**A new GMCB Public Comment has been received.**

**Submit Time:** 6/23/2023

**Name:** Theresa Borden

**Affiliation:**

**Town/City:** Monkton

**Topic:** Health Insurance Rate Review

**Comment:** My doctor recently prescribed a medication which my insurance company (MVP) declined to cover. The medication was [REDACTED], my doctor prescribed this medication because I have [REDACTED] which I suffer from [REDACTED]. My doctor prescribed an alternative which they covered still costing me \$661.00. I'm in a donut hole which requires me to spend \$7400.00 before obtaining an affordable outcome. There are several issues I have encountered which requires me to pay for services I feel are unaffordable. I would rate my overall experience with MVP as extremely unfavorable. My purpose for bringing this issue to you is mainly to highlight issues surrounding MVP performance. Thank you

**Post Comment:** Yes

**A new GMCB Public Comment has been received.**

**Submit Time:** 6/25/2023

**Name:** Sharon Gutwin

**Affiliation:**

**Town/City:** Barre

**Topic:** Health Insurance Rate Review

**Comment:**

**Post Comment:** Yes

I appreciate all the work the board and support staff is putting into this year's regulatory duties. Vermont is not alone in recognizing regulatory failures of the past and working to bring more accountability to bear on major forces within health care systems. The GMCB is taking a laudable stance in challenging the status quo in consideration of the entire health care system and Vermonters it serves.

The following quote comes from the article I received today. As you prepare to face BCBS and MVP, I expect more "looking under the hood" will be revealed.

***" Economic principles suggest that there should be some correlation between quality and price for services, but the data reveals that there is not. Are commercial payers prepared to explain the variation in commercial rates for the same quality of services, as well as the premium rates they pay for worse quality? Is that range attributable to the supposed market power of dominant health systems, or something else? As more is revealed from "under the hood" of rate negotiation, the balance of power will continue to shift to employers and away from payers and health systems."***

Sharon Gutwin PT (owner of the RG and Kismet Place)  
373 Blair Park Rd.  
Suite 203  
Williston, VT 05495  
802.238.8087

----- Forwarded message -----

From: **Sanjula Jain** <[sanjula.jain@trillianthealth.com](mailto:sanjula.jain@trillianthealth.com)>

Date: Sun, Jun 25, 2023 at 4:01 PM

Subject: Market Composition Is Essential in Defining Hospital Peers, But Market Competition Is Not Indicative of Quality and Price

To: <[sharon@kismetplace.com](mailto:sharon@kismetplace.com)>



## Market Composition Is Essential in Defining Hospital Peers, But Market Competition Is Not Indicative of Quality and Price

### Key Takeaways

1. While Cedars-Sinai and Cleveland Clinic are undoubtedly two of the top U.S. hospitals, the disparate market characteristics between Los Angeles and Cleveland preclude these hospitals from being “true peers.”
2. CMS’s Transparency in Coverage initiative reveals stark disparities in negotiated price for identical healthcare services, regardless of market composition.
3. In analyzing an example market (Chicago), negotiated rates for MS-DRG 470 range from \$15,299 to \$55,084 from the same payer, revealing no correlation between negotiated rates and quality outcomes.

Most healthcare veterans know that healthcare is local and, therefore, “know” that demand for healthcare services varies across markets. Executives who are deeply familiar with the market(s) in which they operate will ultimately be the most successful—financially, operationally and most importantly, in delivering high-value, quality healthcare.

Accurate benchmarking is essential to competing effectively. Earlier this month, we released [2023 SimilarityIndex™ | Hospitals](#), which enables accurate benchmarking by allowing stakeholders to identify a hospital’s group of empirically similar hospitals (“true peers”) and then compare the performance of the peer group nationally across Quality, Financial, Competitive and Price Indexes.




### Markets Determine Your Peers, Even for Renowned Hospital Brands

A key finding of our benchmarking analysis is the foundational impact of market characteristics in determining peer groups. For example, while Cedars-Sinai and Cleveland Clinic are undoubtedly two of the top U.S. hospitals, the disparate market characteristics of Los Angeles and Cleveland preclude these hospitals from being “true peers.”

The extent to which market characteristics determine mathematical peers is evident with Cedars-Sinai, located in Los Angeles, CA (Figure 1). Although only the 10 most similar hospitals are shown below, 43 of Cedar-Sinai’s 50 peer hospitals are concentrated in Southern California. Similarly, all 50 peers of Medical City Las Colinas—located outside of Dallas, TX—are concentrated in the greater Dallas and Houston metropolitan areas. In contrast, Geisinger’s peers are national in scope but operate in markets with similar characteristics.

Additionally, 2023 SimilarityIndex™ | Hospitals reinforces how renowned hospitals are often in a “league of their own” evidenced by the mathematical distance to the hospital that is most similar to Cedars-Sinai, which is UCLA with a Similarity Score of 68.92 out of 100. In contrast, the hospital that is *ninth* most similar to Medical City Las Colinas is Baylor Scott & White Rowlett, with a Similarity Score of 95.82.

**FIGURE 1. TOP 10 PEERS FOR CEDARS-SINAI, GEISINGER AND MEDICAL CITY LAS COLINAS**

								
System Name and Rank	CBSA	SimilarityIndex™ Score	System Name and Rank	CBSA	SimilarityIndex™ Score	System Name and Rank	CBSA	SimilarityIndex™ Score
1 UCLA Medical Center	Los Angeles–Long Beach–Anaheim, CA	68.92	1 Milton S. Hershey Medical Center	Harrisburg–Carlisle, PA	76.92	1 Medical City Alliance	Dallas–Fort Worth–Arlington, TX	99.59
2 Huntington Hospital	Los Angeles–Long Beach–Anaheim, CA	63.76	2 MetroHealth System	Cleveland–Elyria, OH	74.13	2 Wise Regional Health System	Dallas–Fort Worth–Arlington, TX	99.10
3 Pomona Valley Medical Center	Los Angeles–Long Beach–Anaheim, CA	63.28	3 North Carolina Baptist Hospital	Winston-Salem, NC	74.01	3 Baylor Scott & White Sunnyvale	Dallas–Fort Worth–Arlington, TX	99.06
4 White Memorial Medical Center	Los Angeles–Long Beach–Anaheim, CA	62.75	4 Strong Memorial Hospital	Rochester, NY	73.13	4 Sana Healthcare	Dallas–Fort Worth–Arlington, TX	98.27
5 Providence St. Joseph Hospital	Los Angeles–Long Beach–Anaheim, CA	62.70	5 University Hospital SUNY	Syracuse, NY	72.77	5 Texas Health Resources, Rockwall	Dallas–Fort Worth–Arlington, TX	96.64
6 Good Samaritan Hospital	Los Angeles–Long Beach–Anaheim, CA	62.12	6 Rhode Island Hospital	Providence–Warwick, RI-MA	71.93	6 Baylor Scott & White Waxahatchie	Dallas–Fort Worth–Arlington, TX	96.59
7 Providence Mission Hospital	Los Angeles–Long Beach–Anaheim, CA	61.19	7 USA Health University Hospital	Mobile, AL	69.33	7 Texas Health Resources, Cleburne	Dallas–Fort Worth–Arlington, TX	96.17
8 St Mary Medical Center	Los Angeles–Long Beach–Anaheim, CA	60.76	8 Mercy St Vincent Medical Center	Toledo, OH	69.20	8 Texas Health Resources, Ft. Worth	Dallas–Fort Worth–Arlington, TX	95.99
9 Advocate Christ Hospital	Chicago–Naperville–Elgin, IL-IN-WI	60.42	9 Allegheny General Hospital	Pittsburgh, PA	68.54	9 Baylor Scott & White Rowlett	Dallas–Fort Worth–Arlington, TX	95.82
10 Northridge Hospital	Los Angeles–Long Beach–Anaheim, CA	60.14	10 Albany Medical Center	Albany–Schenectady–Troy, NY	68.15	10 Medical City Lewisville	Dallas–Fort Worth–Arlington, TX	95.52

Source: Trilliant Health SimilarityIndex™ | Hospitals. • PNG



Only a handful of health systems are even remotely similar to Cedars-Sinai or Geisinger, and their peers are **not** the facilities that they or the industry have been primed to expect. In contrast, hospitals in markets characterized by decades of competition between for-profit and not-for-profit

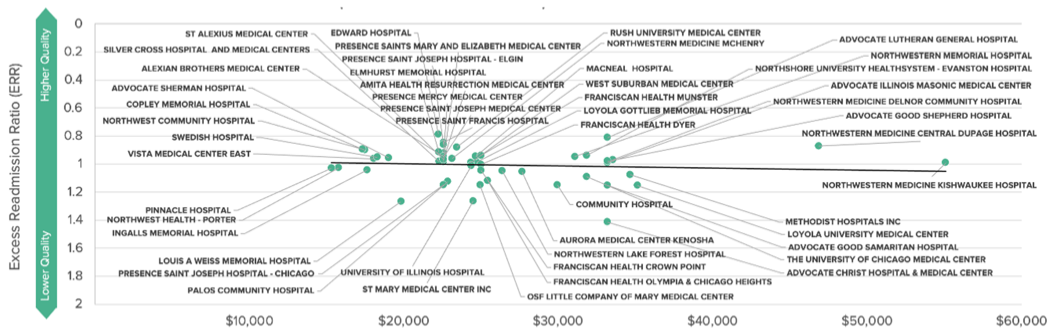
health systems are virtually indistinguishable—except for the reimbursement they receive for the exact same service.

## Even Within a Single Market, There Is Substantial Variation Between Price...But Not Quality

A common misconception in healthcare is that the market power of dominant health systems is attributable to higher rates in more concentrated markets.<sup>2,3,4,5</sup> However, the implementation of CMS’s Transparency in Coverage initiative has revealed stark disparities in negotiated price for identical healthcare services, regardless of market composition.

Using Chicago as an example, we compared the negotiated rate paid by UnitedHealthcare for MS-DRG 470 (i.e., Major Hip and Knee Joint Replacement or Reattachment of Lower Extremity Without Major Complication or Comorbidity) and the excess readmission ratio (ERR) from CMS’s Hospital Readmissions Reduction Program for a subset of short-term acute care hospitals (Figure 2). The negotiated rates for MS-DRG 470 range from \$15,299 to \$55,084, revealing no correlation between negotiated rates and quality outcomes, which is true for dozens of U.S. markets across payers and other MS-DRGs.

**FIGURE 2.** QUALITY VS. IN-NETWORK NEGOTIATED RATES FOR DRG-470 (HIP & KNEE REPLACEMENT) IN CHICAGO-NAPERVILLE-ELGIN, IL-IN-WI



Note: Analysis was conducted using negotiated rates for a single national payer. Source: Trilliant Health’s national all-payer claims database, Provider Directory and national Health Plan Price Transparency dataset and analysis of Hospital Readmissions Reduction Program (HRRP) data. • PNG



While analyzing the variation among a single payer provides important insights, analyzing all the payers operating in a given market will be crucial for delivering value for money, especially for employers. For example, if a large employer knew what all providers in a market are paid and could access provider-level quality metrics, their negotiating leverage would increase, thus enabling them

to design networks and benefits for specific providers at a lower cost and comparable quality (i.e. value, for their employees).

Economic principles suggest that there *should* be some correlation between quality and price for services, but the data reveals that there is not. Are commercial payers prepared to explain the variation in commercial rates for the same quality of services, as well as the premium rates they pay for worse quality? Is that range attributable to the supposed market power of dominant health systems, or something else? As more is revealed from “under the hood” of rate negotiation, the balance of power will continue to shift to employers and away from payers and health systems.

In subsequent research, we will further analyze the competitive makeup of individual markets to explore the relationship of “value for money” and competition dynamics.

**Given the upcoming July 4th holiday, the next issue of *The Compass* will be released on July 9, 2023.**



Sanjula Jain, Ph.D.

SVP, Market Strategy and Chief Research Officer  
Trilliant Health

***Thanks to Matt Ikard, Katie Patton and Lindsey Swearingen for their research support.***



**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes


**Name:** Zoe Cunningham-Cook

**Town:** Brattleboro, VT

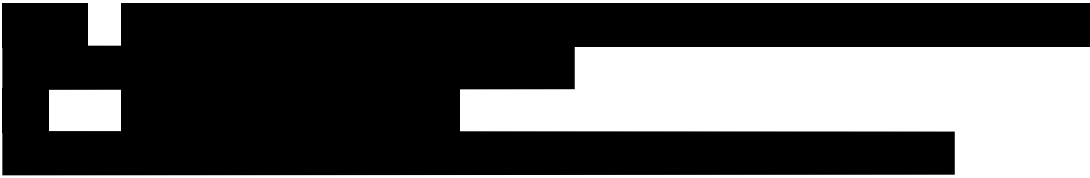
**I get my insurance from:** Employer (self or household member)

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

I am an individual with . My deductible covers my yearly care when my disease is stable, but if I have a relapse I need far more care and could exceed my deductible. Boosting the premium price by this amount would seriously impact my ability to pay out-of-pocket if I exceed my deductible. Not to mention--I also have student debt which makes my ability to pay more for my basic needs very difficult. Neither I nor other Vermonters struggle to afford our basic needs, and a premium increase of this amount would seriously impact us for the worse.





**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Rio Roche


**Town:** Burlington

**I get my insurance from:** Employer (self or household member)

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

As a new college graduate, I need to be able to save all of the money I can. Raising the insurance premiums would put me in a difficult position financially, as I'm sure is the case with other Vermonters. Keep healthcare affordable!



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** No

**Name:** Deb Light


**Town:** Burlington, VT

**I get my insurance from:** Direct through BCBSVT or MVP

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

Our rates for my husband and I are already the highest we have ever paid for health insurance for my husband, for the least amount of coverage. Please do not raise rates yet again.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Kenneth Russell


**Town:** East Montpelier

**I get my insurance from:** Employer (self or household member)

**My insurance company is:** MVP

**Comment:**

We were supposed to get beyond this. Whatever happened to the vision of controlling health care costs. I would implore the Green Mountain Care Board, the directors of MVP and BCBS, and any entities with any leverage in the situation to act with courage and determination to not only bend the cost curve but to bring costs down. Too many lives are at stake not to.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Matthew Lawrence LeFluer

**Town:** Alburgh

**I get my insurance from:** Federal Government Program

**My insurance company is:** Medicaid/ Medicare

**Comment:**

Individuals Like My Family Doesn't Need Or Want A Premium Rate Hike On There Healthcare Plan



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## 2024 Vermont Individual and Small Group Rate Filing Comment

**Post full comment online:** Yes

**Name:** Sally Ober

**Town:** Lincoln

**I get my insurance from:** Employer (self or household member)


**My insurance company is:** MVP

### **Comment:**

I am one of the privileged people in Vermont who works full-time and receives health insurance through my employer. I am also fortunate to be married to someone who is male, and he contributes to our household income (at a higher pay rate than me as a female). I am a town clerk. My annual MVP insurance premium (family plan) costs my employer an amount that is equivalent to 72% of my annual gross income. In addition to that, I now contribute 8% from my paycheck toward the annual premium for our family's coverage. This is astounding! Whenever I receive a cost of living increase in my salary, it just gets swallowed up by the increase in health insurance contributions. My pay stays essentially stagnant, and this doesn't help me with the increasing prices at the grocery store and it doesn't help me keep up with owning my home. Our property taxes soar because of this tremendous impact of health insurance on local school and municipal budgets.

As a town clerk, I see people in my community struggling with the cost of living here in Vermont. I see folks whose property is foreclosed, people who get into financial trouble when they become ill, and those who cannot survive on a single income. The saddest are those who are not receiving the health care they need because they cannot afford it at all. This includes care for both physical and mental health ailments. It is beyond belief that in our country, people are faced with choosing whether to eat and put a roof over their heads, or obtaining health care. If my employer did not offer health insurance as a benefit, I don't know how we would afford it. I am very concerned for our eldest daughter who will age out of our family plan next year. She is working to prepare for attending graduate school soon and is trying to save up so she can move. I fear that the exorbitant cost of health insurance premiums will lead her to drop coverage. How does any unmarried individual survive these days?

I recognize the important work that our health care providers do and that it all costs a lot to make these services available. Please; inflation is impacting everyone, but rate increases of 12.5% to 15.5% are not in line with what is reasonable. Your decision has a real bearing on the lives of Vermonters. Do the right thing, and bring these numbers down significantly. Thank you.



**EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.**

**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Susan Alexander


**Town:** Arlington

**I get my insurance from:** AARP

**My insurance company is:** AARP

**Comment:**

These insurance companies are making it harder and harder to keep medical insurance and, therefore, get medical care. There must be limits to this greed.



**EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.**

**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Winifred Gay

**Town:** Burlington

**I get my insurance from:** Direct through BCBSVT or MVP

**My insurance company is:** Blue Cross Blue Shield of Vermont Medigap plan

**Comment:**

Is the Blue Cross Blue Shield of Vermont average 15.5% increase for their Medigap plans, too? At age 65 we were forced to start on Medicare because my husband's employer has fewer than 20 employees. He is anticipating starting his retirement Jan 1 2024. A large increase in medical insurance for next year (and future years if this trend continues) could be difficult for us, as well as for others with fixed incomes (i.e. for those who are retired)



new GMCB Public Comment has been received.

Submit Time: 7/5/2023 9:12:02 PM

Name: Ann Stephens

Email address: ann@stephensprecision.com

Affiliation: Stephens Precision, Inc., a Vermont small woman-owned business

Town/City: Bradford, VT

Topic: Health Insurance Rate Review

Comment: • The filed insurance increases for the small group market are unsustainable for small businesses and their employees. If our company has to shoulder such high increases., we may cut our percentage of contribution for each employees, making the individuals suffer economically. • Most people in the small group already saw double-digit rate increases last year. • Vermonters already face historical economic uncertainty with inflation, a new state payroll tax, expiration of federal tax credits, increasing property taxes, increasing motor vehicle and professional license fees, severe workforce shortages, and more. • If implemented as proposed, these increases would amplify economic hardships. • Ask the GMCB to consider these economic factors and the impact on small businesses as they review insurance rates and hospital budgets.

Post Comment: Yes



July 3, 2023

Owen Foster, Chair  
Green Mountain Care Board  
144 State Street  
Montpelier, Vermont 05602

Dear Chair Foster,

Please consider this letter as part of the official rate case for the commercial insurance rate filings currently before the Green Mountain Care Board as well as insight for the hospital budget review process. The filed increases for the small group market for Blue Cross Blue Shield of Vermont's proposed 2024 premium increase of 14.5% and MVP Health Care's increase proposal of 12.5% is unsustainable for the small group market and the people who work at these businesses. In your examination of the filing, I encourage you to develop a path to a lower rate. These double-digit rate increases follow last year's double-digit rate increases, establishing an unmanageable trend especially when considering the financial stresses already faced by Vermont's business community and their employees.

As a regulator, please review the hospital budgets and the insurance rates while taking into consideration the burden businesses are experiencing. To put that in context, below is a list of ongoing pressures Vermont's businesses are currently managing:

- Inflation is currently at 4%, down from a high of nearly 9% last year but still well above the norm, impacting the cost of gasoline, food, housing, childcare and many other items
- Vermonters will feel a new state payroll tax in 2024
- Some federal tax credits for businesses are expiring
- Property taxes will increase
- Fees for motor vehicles and professional licenses are mandated to increase
- Wages have increased about 10% in the last year, which increases other employer taxes
- Supply chain interruptions costing over \$228 million a year
- Workforce shortages continue to constrain business growth

These increases are all just in a 12–18-month period - some from state and federal government, some from the results of the pandemic and some from the changing economy. If implemented, these proposed insurance increases would amplify these hardships and harm the economic health of our State. Vermont employers work every day to ensure their employees are provided with the best compensation possible, this includes health care access. With employer provided insurance access a costly, but essential employment benefit, these increases risk raising overall costs to a point that is

unsustainable for many businesses. Health care coverage is a major component of the wage and benefit package and yet as insurance premiums rise, employers face the difficult choice of placing that additional cost solely onto their balance sheet or to share that with their employees; neither one being desirable.

We understand that the cost of providing health care and insuring Vermonters is expensive, stemming from a combination of factors including increased utilization, rising prescriptions drugs costs, staffing and other economic pressures. Many of the same economic pressures cited above also impact health care providers, especially with our aging demographics. We know that the 65+ cohort uses health care at a much greater rate and with 100,000 Vermonters entering this demographic in the next decade, we see cost pressures rising even more. Our hospitals deliver quality care with their own increasing level of cost pressures. Providing adequate resources to address Vermonters' health needs and doing so in an affordable way is a vexing problem with no easy solutions. However, we ask that the Board seek a path forward to balance the need with the cost, so that the payers – businesses and workers – can navigate the overall increasing cost pressures.

Thank you for considering our position. We are grateful for the opportunity to be a voice for Vermont's businesses.

Sincerely,

A handwritten signature in cursive script that reads "Betsy Bishop".

Betsy Bishop  
President

**A new GMCB Public Comment has been received.**

**Submit Time:** 07/07/2023

**Name:** Deb Kirchwey

**Affiliation:**

**Town/City:** Brookline, VT

**Topic:** Health Insurance Rate Review

**Comment:**

Dear GMCB Board:

The people cannot continue to bear yearly double-digit increases in premiums.

When I first moved to Vermont, my health insurance in **2002 was \$118 a month** for a “major medical” plan with a \$3500 deductible/out of pocket max. Now **in 2023 it’s \$894 a month** with a \$1250 deductible/\$5150 out of pocket max. That’s a 657% increase in premiums in 21 years, which I believe works out to 10.1 % per year. (Not to mention the increased out of pocket!) This rate of increase is utterly unsustainable. If I’m lucky enough to live another 21 years, at this rate my premium would be **\$6713 per month in 2044!!** And that’s just for one person in our two-person family. Double the #s above for both of us.

While currently we are eligible for a subsidy which brings the cost down to something manageable, that is only definite through 2025, as I understand it.

We cannot count on a subsidy to make this system work, because given the national political landscape, we cannot rely on its continuance. When that subsidy goes, the whole system will come crashing down. Few people will be able to afford the full rate that BCBS is currently charging, not to mention the current rate plus another double-digit increase.

PLEASE do something to bring this insanity to a stop.

Thank you,  
Deb Kirchwey  
Brookline, VT

**Post Comment:** Yes



new GMCB Public Comment has been received.

Submit Time: 7/7/2023 1:07:31 AM

Name: Emily Trostel

Email address: Em.trostel@gmail.com

Affiliation:

Town/City: Hinesburg

Topic: Health Insurance Rate Review

Comment: Insurance rates for Vermonters are outrageous. The system is broken, and the middle class suffers and foots the bill. How can these companies justify double digit rate increases year after year while plans cover less and less? OUTRAGEOUS costs. Silver plans have gone up by nearly \$400 a month in the last 6 years. Has anyones salary increased that much? Have my taxes decreased? No. This is insane. No one can afford care unless you are below the poverty line or ultra wealthy. Please do not approve these astronomical rate increases. I dont know why the state opted out of the federal exchange, feels like we shot ourselves in the foot. But here we are. DO SOMETHING.

Post Comment: Yes



new GMCB Public Comment has been received.

Submit Time: 7/5/2023 9:11:59 PM

Name: Glenn Heitsmith

Email address: timberinn@tds.net

Affiliation: Timber Inn Motel, co-owner

Town/City: Ludlow

Topic: Health Insurance Rate Review

Comment: The filed insurance increases for the small group market are unsustainable for small businesses and their employees. Most people in the small group already saw double-digit rate increases last year. Vermonters already face historical economic uncertainty with inflation, a new state payroll tax, expiration of federal tax credits, increasing property taxes, increasing motor vehicle and professional license fees, severe workforce shortages, and more. If implemented as proposed, these increases would amplify economic hardships. Please consider these economic factors and the impact on small businesses as your review insurance rates and hospital budgets.

Post Comment: Yes



A new GMCB Public Comment has been received.

Submit Time: 7/5/2023 4:06:53 PM

Name: Joseph Greene, AIA

Email address: joe@josepharchitects.com


Affiliation: Architect - Small Business Owner

Town/City: Waterbury

Topic: Health Insurance Rate Review

Comment: • The filed insurance increases for the small group market are unsustainable for small businesses and their employees. • Most people in the small group already saw double-digit rate increases last year. • Vermonters already face historical economic uncertainty with inflation, a new state payroll tax, expiration of federal tax credits, increasing property taxes, increasing motor vehicle and professional license fees, severe workforce shortages, and more. • If implemented as proposed, these increases would amplify economic hardships. Please consider these economic factors and the impact on small businesses as you review insurance rates and hospital budgets.

Post Comment: Yes



A new GMCB Public Comment has been received.

Submit Time: 7/5/2023 9:12:51 PM

Name: Joseph Polito

Email address: jpolito@southshire.com

Affiliation: South Shire

Town/City: Bennington

Topic: Health Insurance Rate Review

Comment: Small businesses will suffer and potentially close with all the increases in business costs!

Post Comment: Yes



A new GMCB Public Comment has been received.

Submit Time: 7/6/2023 3:06:26 PM

Name: Julia Marks

Email address: jlmarks722@gmail.com

Affiliation:


Town/City: Jericho

Topic: Health Insurance Rate Review

Comment: Roughly 15% of Vermonters are self-employed. And part-time employees rarely receive health benefits from employers. Paying out-of-pocket health insurance premiums has become an especially egregious burden for those of us who are mid-career, self- and/or part-time employed in Vermont. Any action that continues to increase financial pressure on our middle-income is a step backward for the state and its goals to boost the "missing middle". Why do Vermont policies continue to only promote being either really poor or really wealthy? What about those of us left in the middle, having to pay for everything?

Post Comment: Yes





A new GMCB Public Comment has been received.

Submit Time: 7/7/2023 6:21:26 PM

Name: Robert L. Hoffman M.A.,LPC, MPH

Email address: Rhoffman@mansfieldbehavioralhealth.com


Affiliation:

Town/City:

Topic: Health Insurance Rate Review

Comment: BCBS VT is to be applauded for its aggregate reduction in administrative costs and endeavors to lower the burden of prescription drugs with its innovative new Rx program. Similar efforts at lean management and innovation should be demanded of hospitals who drive the majority of cost growth in the health care system. BCBS VT should be rewarded for these efforts by approving its rate request as submitted. Moreover, BCBS VT should be resourced for its lean approach and innovation in visioning for health care reform in APM 2.0.

Post Comment: Yes



A new GMCB Public Comment has been received.

Submit Time: 7/8/2023 1:30:06 PM

Name: Stanley Kimball Jr

Email address: Ejkimbals@comcast.net


Affiliation:

Town/City: Bennington ,Vermont

Topic: Health Insurance Rate Review

Comment: Dissatisfied with proposed increase from BCBS Vt ,I have a medigap plan single which I pay \$196.79 monthly after increase in 2022.With inflation electric ,affordable heat act on the way drugswhich I have separate plan for.Social security is proposing 3% raise next if this goes thru I will have to drop something .Thank you for listening sincerely Stanley Kimball

Post Comment: Yes



A new GMCB Public Comment has been received.

Submit Time: 7/7/2023 11:27:00 AM

Name: Trine Bech

Email address: familyoutcomes@yahoo.com


Affiliation:

Town/City: Burlington

Topic: Health Insurance Rate Review

Comment: I have been watching health care "reform" for too long. The One Care model is deeply flawed as it assumes that providers will do a better job by paying for performance, and One Care has been allowed to flounder with no accountability and no measurable results for way too long. This is part of why giving the current system a huge raise is the wrong way to go. We need a new system not more money to pay the current failing one.

Post Comment: Yes



A new GMCB Public Comment has been received.

Submit Time: 7/6/2023 11:25:29 AM

Name: Winifred Gay

Email address: WLG@searching4sunsets.com

Affiliation: Blue Cross Blue Shield of Vermont Medigap subscriber

Town/City: Burlington

Topic: Health Insurance Rate Review

Comment: As an older adult [REDACTED], I am concerned about affordable access to quality medical care in retirement. I realize that inflation is making everything more expensive. I also have reservations about the quality of medical care that I will receive as a Medicare patient, because Medicare reimbursements are so low, and because of Medicare requirements and restrictions. We opted to purchase a Blue Cross and Blue Shield of Vermont Medigap plan to supplement our Medicare insurance. We were forced to start on Medicare at age 65, even though my husband is still working, because his employer has fewer than 20 employees. He is looking at starting his retirement in 2024. Double-digit -- and larger than inflation -- increases to Blue Cross Blue Shield of Vermont medical insurance will make living on a smaller income in retirement more difficult.

Post Comment: Yes



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** David Traver Adolphus

**Town:** Sunderland, VT

**I get my insurance from:**

**My insurance company is:** I don't have health insurance.

**Comment:**

I was laid off on February 1st, and just started working freelance three weeks ago, losing my subsidy for Green Mountain Care. My wife works in early childhood education and doesn't have health insurance available, so buying healthcare for my family of four on the open market is going to reduce my take-home pay to less than minimum wage.

On paper, our combined income looks fine, but in reality, I have an elderly parent at home with me and two school-aged children. Healthcare is already unaffordable for even middle-income families. The rates should be going down, not up.

**A new GMCB Public Comment has been received.**

**Submit Time:** 07/08/2023

**Name:** Adam Nilson

**Affiliation:** Atlas


**Town/City:** Shelburne

**Topic:** Health Insurance Rate Review

**Comment:**

We struggled to manage the large increase in health premium last year. Another increase this year would force us to cover less premium for our staff. We take pride in having a great plan with BS/BC and covering almost all the premium for our staff. We have been able to withstand the added pressures from inflation to date, but margins have become smaller. Large added cost to our benefits package is not sustainable in the coming year.

**Post Comment:** Yes



A new GMCB Public Comment has been received.

Submit Time: 7/10/2023 3:36:58 PM

Name: KENNETH SWIERAD

Email address: vtlog@comcast.net

Affiliation: Retired Educator

Town/City: Bennington

Topic: Health Insurance Rate Review

Comment: I retired from teaching in Massachusetts and receive my co insurance for Medicare from my old school district, MA Blue Cross Blue Shield, MEDIX. There has been NO premium increase for the pass four years and it is a great plan where we only pay for medicine, no co pays. I just wonder what the state of Vermont is doing wrong when insurance rates go up double digits for the past several years.I am the chair of South West Tech and see how the rate increases are killing our budget! it appears that the working people are supporting the medical system in Vermont. Please keep me informed on what is going on with this rate increase!!

Post Comment: Yes

**A new GMCB Public Comment has been received.**

**Submit Time:** 07/09/2023

**Name:** Judith McGraw

**Affiliation:**

**Town/City:**

**Topic:** Health Insurance Rate Review

**Comment:**

As a person who has [REDACTED] and a person reaching the age of inability to work because I have had to work more jobs than hours in a day just to afford health care, I am urging you to consider NOT RAISING RATES again. People are struggling to pay for basic necessities such as food, housing, gas, and heat. I see it daily as an essential worker. More and more people who are going without medication and food. People living in vehicles because we have no housing. Now is not the time. Same with power rates. Give us hard working minimum wage workers a break. Here's a thought, how about you work 40 hours a week for \$14.00 and have to buy your own insurance, pay rent or mortgage, as well as your utility bills. Oh and don't forget to buy your groceries. Yeah suddenly you would change your mind about rate hikes. Stop allowing for bonuses at the top and make those executives go without.

A concerned citizen who not only pays my own insurance but pays property taxes of \$6000/year which covers town employee insurance too.

**Post Comment:** Yes



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Donna Laurin


**Town:** Glover

**I get my insurance from:** Direct through BCBSVT or MVP

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

I am [REDACTED] and have Medicare and buy a supplement through BCBS I already pay \$286.77 a month as I have Plan F the most comprehensive coverage. I am a [REDACTED] and I [REDACTED]. I never know if my [REDACTED] will re-appear or my [REDACTED], so I need really good coverage. My prescription plan is also through BCBS and I pay \$41.70 a month for that. I really can't afford to be paying much more for health insurance. I do pay a Medicare premium too of \$168.10 I believe and I pay a separate dental coverage plan. Please reconsider a big rate hike such as what is proposed.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Gary Smith


**Town:** Bristol

**I get my insurance from:** Direct through BCBSVT or MVP

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

My wife and I, 80 and 75 respectively, are both on limited Social Security and very modest pensions. We are very frugal and yet, with the combination of cost increases, have to draw on our savings every month to pay the bills. With no other incomes this backstop resource will dwindle away. We are already diligently monitoring food and other basic expenses an additional increase in health expenses simply adds sever difficulty to an already difficult situation, one that we can barely handle as it currently is.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Heather Bent


**Town:** Randolph Center

**I get my insurance from:**

**My insurance company is:** I don't have health insurance.

**Comment:**

Running a small business is already challenging to afford and offering health insurance to our employees is something I would love to be able to afford. Continually increasing the cost of insurance makes this an impossibility.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Heather Stevenson

**Town:** Rutland City

**I get my insurance from:** Employer (self or household member)

**My insurance company is:** MVP

**Comment:**

Please don't raise rates. Instead of placing rising healthcare costs on the consumers--who are not the source of the rising costs--we should be moving to a single payer model that forces medical companies to market their services at fair, affordable prices. Private individuals should not be allowed to profit off of the suffering of others.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Heidi Sulis


**Town:** Middlebury

**I get my insurance from:** Direct through BCBSVT or MVP

**My insurance company is:** MVP

**Comment:**

I am the executive director of a free healthcare clinic in Middlebury with fewer than 6FTEs and an average annual expense budget of \$589,000 which I am responsible for raising. Only two of us need health insurance and last year our rates through MVP increased by 20% and 14% respectively for 2023. This cost prohibitive increase resulted in several conversations at staff and board levels which yielded a decision to drop our health insurance benefit. This felt terrible as an employer of a health care organization. Double digit increases are untenable for our organization; and it feels punitive that MVP/other insurers are charging us exorbitant rates that we cannot afford. It is a sad state of affairs that those of us who need health insurance can go out on the exchange, qualify for VERY SIGNIFICANT subsidies that cut our premiums in half or more. I feel that the health insurance companies should be working much harder on behalf of small businesses/organizations and non-profits to offer plans that compete with the exchange and are actually affordable.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes


**Name:** Marjorie Bertram

**Town:** Isle La Motte

**I get my insurance from:** Vermont Health Connect

**My insurance company is:** MVP

**Comment:**

Vpharm is ridiculous. Refused to pay the copay/ deductible to cvs eventhough cvs is listed as an eligible pharmacy. NOWHERE in the handbook does it say pharmacy has to be physically in Vt. I had 90 day script for my  medicine.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Melanie Clark

**Town:** Ferrisburgh

**I get my insurance from:** Employer (self or household member)

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

As a VHC Assister, I help individuals review their health insurance options on a daily basis. Since 2013, I've seen the cost of premiums and out-of-pocket costs rise dramatically. The increase in subsidies as a result of the American Rescue Plan Act and the family Glitch Fix has eased some of the financial strain for individuals and families around purchasing health insurance, but it isn't enough. The Government's definition of "affordability" doesn't match people's reality. As costs of everything from groceries, to fuel, to daycare continue to outpace raises and cost-of-living increases, it is becoming harder and harder for individuals to afford their premiums and out-of-pocket healthcare costs. The choice between feeding your family or getting your prescription drugs is an impossible choice that nobody should have to make. The State of Vermont needs to take a stand and stop allowing insurance agencies to increase their premiums and out-of-pocket costs at rates far outpacing individual's ability to afford them. I urge you to not approve the proposed rate increases submitted by both BCBSVT and MVP. I also urge you to not fall prey to their strategy of over-inflating their initial percentage rate in order to settle on a slightly lower-increase. Let's say "NO" to any increases for the next couple of years and force the insurance and healthcare industry to tighten their belts and force the legislature to think outside the box to solve this healthcare crisis. Continually increasing health insurance premiums and out-of-pocket costs is not the solution to this problem. Let's do better.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Nancy Bloomfield

**Town:** Sharon, Vermont


**I get my insurance from:** Employer (self or household member)

**My insurance company is:** MVP

**Comment:**

I am the Executive Director of a human services organization that has struggled to keep up with the increases in premiums over the past decade. Several years ago, we switched from Blue Cross coverage to MVP simply because that year, BCBS's rates had jumped above MVPs. We continue to consider a switch back and forth each year to make it possible for us to continue providing as much support for premium costs as we can, but the coverage changes are difficult for employees. As a non-profit, we have focused on covering employees and have not been able to expand to covering employee's children or spouses because it's simply not possible. With the significant increases in recent years, we have employees with children who are devoting close to 25% of their annual incomes to health coverage alone. That is unreasonable and untenable. Over the past three years specifically, employees who had once elected Gold or Silver level coverage are shifting to high deductible plans because they can't afford anything better. As an employer, we are doing our best to keep pace and reduce the burden on employees, but we cannot keep up. Health insurance is becoming the most important driver of current and prospective employees' employment choices, and that is a shame. We need people to be applying their skills and efforts where they are best suited and most needed, not making their decisions based on the coverage available. Thank you for placing regular working people at the center of your decision making, not the profit-hungry insurance industry.





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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Petya Devallance

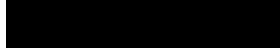
**Town:** Essex Junction

**I get my insurance from:** Employer (self or household member)

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

While prices are rising for everything, the proposed increase is significant and not in line with current inflation rates. Insurance premiums are already a significant expense for spotty coverage, at best. The burden to the insured is becoming unbearable. Insurance companies should be made to lower profit margins before passing on everything to the consumers.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Savannah Howard

**Town:** Thetford

**I get my insurance from:** Vermont Health Connect

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**


The proposed premium increases by Blue Cross Blue Shield of Vermont and MVP are nothing short of the biggest scam ever. It is outrageous that they have the audacity to ask for such exorbitant price hikes. Individuals and small businesses are already burdened with high healthcare costs, and these increases only add insult to injury.

A 15.5% average increase for individuals and a 14.5% average increase for small businesses by Blue Cross Blue Shield of Vermont, as well as a 12.8% average increase for individuals and a 12.5% average increase for small businesses by MVP, demonstrate their complete disregard for the financial struggles faced by their customers. It's clear that these insurance companies prioritize their own profits over the well-being of the people they are supposed to serve.

These premium hikes are unjustified and unjustifiable. What justifies such significant increases? Are their services suddenly improving to warrant such a price surge? It's highly doubtful. It seems like a classic case of insurance companies taking advantage of their customers, exploiting their need for essential healthcare coverage.

The fact that insurance companies can get away with such practices showcases a broken system that prioritizes corporate interests over the welfare of individuals and businesses. It is disheartening and infuriating to see how these companies continue to profit while their customers suffer the consequences.

This situation highlights the urgent need for comprehensive healthcare reform that holds insurance companies accountable and ensures affordable and accessible coverage for all. It's time for individuals and businesses to demand transparency, fair pricing, and genuine concern for their well-being. This is an outrage, and it is entirely justified to feel unhappy, frustrated, and betrayed by this blatant money-grabbing scheme.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Stacey Gaskell


**Town:** Brattleboro

**I get my insurance from:** Employer (self or household member)

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

Insurance is already ridiculously expensive and pays nothing until almost \$7000 comes out of your own pocket. It's extortion.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Stephanie


**Town:** Rockingham

**I get my insurance from:** Employer (self or household member)

**My insurance company is:** BCBS Anthem

**Comment:**

Healthcare is a human right. All Vermonters need affordable health insurance to ensure access to health care and mental healthcare. Do better. Stand up for your neighbors, our communities, and right to affordable healthcare to ensure access and not deter it. Do better.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Audrey


**Town:** Newport

**I get my insurance from:** Direct through BCBSVT or MVP

**My insurance company is:** MVP

**Comment:**

We can only afford to pay for our son at this point and it already cost us 700\$ per month. We still have a deductible of over 7000\$. We can't afford to add an adult and if the prices go up to 800, we will probably have to cancel our son's insurance.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Sarah Paxnan-Bean


**Town:** Georgia

**I get my insurance from:** Employer (self or household member)

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

Health insurance premiums have risen rapidly, straining the pocketbooks of Vermont families and businesses for more than a decade. Many times, insurance companies have been able to raise rates without explaining their actions to regulators or the public or justifying the reasons for their high premiums. In most cases, consumers receive little or no information about proposed premium increases and aren't told why companies want to raise rates. Let's start with shutting down OneCare, who has done nothing but cost the Vermont Taxpayer more money and has not been accountable to the citizens of Vermont. Not only do we have a health care cost problem, but we also have a retainability of doctor's problem (they are leaving in droves), as well as we have an overall affordability problem in living in the state of Vermont.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Rachel Williams


**Town:** Hartland

**I get my insurance from:** Vermont Health Connect

**My insurance company is:** MVP

**Comment:**

The reality of my families financial situation is I have to take the cheapest plan through the health connect. Due to unexpected injuries I have now added high out of pocket medical bills to my drowning student loan bills, high monthly car payment, and ever growing bills for basic needs. I am the department head for the childcare financial assistance program for the northern Windsor and southern orange counties. At this time I am holding all 3 positions. For the subsidy to run in the area I need to be able to work 40 hours per week. If health insurance keeps increasing I am going to be forced to reduce my hours so that my family qualifies for Medicaid. I hear stories like mine all the time when speaking with clients. We need to stop letting giant corporations squeeze our middle class into poverty. I would love to continue to work fulltime and ensure that state benefit program runs smoothly, but I have to be able to afford to.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Sarah Luman

**Town:** Georgia, VT


**I get my insurance from:** Employer (self or household member)

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

My employer absorbs most of the costs associated with premiums in an effort to save money for the employees. I feel that a much larger cost would be passed on to the employees in order to remain profitable as a small business with less than 50 people.





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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Sherre Ross


**Town:** Milton

**I get my insurance from:** Employer (self or household member)

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

Raising the rates would be a huge impact on me. Before you start raising rates, you need to consider others and how that would impact their families financially. With the price of food, gas, taxes and everything else going up, please consider those less fortunate that can't afford it.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Susan


**Town:** Putney

**I get my insurance from:** Direct through BCBSVT or MVP

**My insurance company is:** Medicare and BCBSVT supplement

**Comment:**

The price of BCBS continues to go up. I am on SS income. I am retired. With prices going up on everything it is difficult to pay my bills. If the price goes up again for health insurance it will cut in to my food money. I know that the heads of these companies make a ton of money. This isn't fair.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Tammy Guilbault

**Town:** Burlington

**I get my insurance from:** Employer (self or household member)

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

I am responding as both an individual and as Director of Human Resources for a nonprofit agency.

Our employees do really meaningful hard work every single day as they work with the vulnerable youth in the Burlington area. Most live paycheck to paycheck, are young, have education loans they'll be paying for years, and paying the enormous amount of rent required to live in Chittenden, where they have access to public transportation. They need to maintain health insurance on top of all that. As an agency we pay 90% of the employee portion and 80% of plus one and family to help our employees out as much as we possibly can. We're a nonprofit and pay thousands of dollars a month in insurance premiums, we simply can't afford a 12 to 15% increase as an employee or employer. Our employees should not have to choose between keeping a roof over their heads, putting food on the table or having insurance to cover their needs.

I ask that you reconsider this premium increase and think about the actual people that need this vital service you provide and reconsider such an enormous rate hike. Thank you.

**EXTERNAL SENDER: Do not open attachments or click on links unless you recognize and trust the sender.**

## 2024 Vermont Individual and Small Group Rate Filing Comment

**Post full comment online:** Yes

**Name:** Allison Hope


**Town:** Richford

**I get my insurance from:** Vermont Health Connect

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

I work for a 2 person non-profit who cannot afford to pay for insurance. This year I received a slight pay increase to help defray some of the costs of health insurance. For all of my professional life (I am now [REDACTED]), I was lucky enough to have really robust employer-sponsored health care. When I switched roles and became the Executive Director of a small but impactful non-profit in the state, I was without insurance coverage for the first time in my life. This is the first year of the last three that I have had coverage. So I'm catching up on "deferred maintenance" like mammograms. After my mammogram, I was called back and referred for a biopsy. As preventative care, I can't image there is a health care provider out there who would suggest that I shouldn't have taken that recommendation and scheduled the biopsy. So I did. Luckily, the spot on my breast was benign, and they've marked it so that it won't be an issue in future mammograms. This 30 minute procedure left me with out of pocket costs of over \$4,000, even after the insurance update to the bill per negotiated rates. So I'm on a payment plan with the hospital for \$200 month for almost 2 years. Where does this leave me when it's time to schedule a colonoscopy? What kind of decision will I make when my provider suggests a biopsy in the future? How will this affect my decisions about future preventative care and how will that play out in terms of cost on the system in the future? My personal monthly cost for insurance is \$400/month WITH the subsidy. And my out of pocket max each year is \$8,000. This is way to unaffordable in a state that already feels excessively unaffordable in terms of housing, cost of living, property taxes, cost to own a car, etc. I'm grateful that I'm healthy and am privileged to even have insurance. But for the sake of our residents and the health of our state, please stop with the unsustainable (to our residents) increases. It's already unaffordable! At this rate, I will be on a permanent payment plan with the UVM Medical Center for the rest of my life. Seems better to not have health insurance and save the \$400/month. I fully understand how the system works as I have been in HR and a Benefits Manager for many years. Our system is broken and allowing for continued increases in a system that is not working for Vermonters makes no sense. BCBS and other providers (limited as our selection is) should have AFFORDABLE plans without such huge deductibles and out of pocket maximums. Vermont prides itself on having small employers and highly functioning non-profits - we need these types of employers. But we penalize employees of these organizations when all the plans they can afford on the health care exchange are essentially offering catastrophic coverage with a side of preventative care. Please do better, and make our insurance companies do better too.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Amanda Spector


**Town:** Westford

**I get my insurance from:** Employer (self or household member)

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

I have worked for a number of small businesses who have struggled to pay health care premiums for their employees. Since I am currently working part time and work for a small business, I don't have access to health care plans through my employer. My husband's employer provides his health insurance and our daughter and I have been added to the policy for a monthly premium. If my husband follows his plan to change employment or reduce his hours next year, and if we acquire a BCBSVT plan with a fairly low deductible, which is preferable based on our needs, we will be paying about one third of our yearly income for health insurance for our family (using the 2023 numbers--it will be more expensive with the increased premiums). Whenever I have checked for cost reductions on the VT Health Connect website, we have made too much money to qualify for the subsidies, and I expect that would be similar next year. We always have additional health care costs for dental care, eye care, out of network providers, deductibles, copays, etc. It is frustrating and difficult to navigate the paperwork and worry about having extra health care costs that affect our ability to save for retirement and cover new expenses. We are a solidly middle class or above family and I know that we struggle way less than others to navigate our complicated health care system and afford and access care. I feel fortunate that we are able to absorb unanticipated medical costs and have health insurance for ourselves, and we don't have to live paycheck to paycheck. It is unconscionable that premiums and other costs are increasing while Vermonters are struggling with covering basic needs like food and housing. There is more than enough wealth in this country to provide health care for everyone with a universal, publicly funded health care system which would be less expensive than our current private one. I would rather have one-third of my family's income going to support basic needs (including health care) of a fair and universal, Medicare-for-all system than to enrich a private insurance company whose costs continually grow.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Bradley, Myerson


**Town:** Pawlet, Vermont

**I get my insurance from:** Direct through BCBSVT or MVP

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

as a senior on a fixed income, a double digit health insurance premium increase is ridiculous! Blue Cross Blue Shield can't justify these annual double digit premium increases. How much are they spending on advertising, executive pay and bonuses? I have no choice, but to go along with any such increase, but there are many Vermonters, not as lucky as me who will suffer tremendously if they have to pay a double digit insurance rate increase. Please cut down or deny outright the Blue Cross Blue Shield premium request.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Claire Graybuck


**Town:** South Burlington

**I get my insurance from:** Vermont Health Connect

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

Hello. I have lived in Vermont for my entire adult life, and I love it here. I love my home, my neighborhood, I love hiking nearby and growing my garden. I have built a life for myself here, and one that I want to keep. This proposed price increase puts all of that at risk. I live with my spouse and just for the two of us, after all the assistance we qualify for, we pay almost \$1,500 per month in insurance. I met my deductible in February, and that still leaves me having to pay for medical care. I would estimate that health insurance plus medical costs account for about a third of the money we spend in a year, maybe more. Our health insurance premium alone is our largest expense, even without accounting for all the money spent on appointments, tests, medications, dental care, vision care, and all the rest. Every year the cost increases and the coverage gets worse. Meanwhile, the company claims to be not-for-profit, but maintains 500-700 times the money necessary to cover contingencies. Executive officers draw obscenely high salaries. Medical providers falsely inflate their prices to offset insurance negotiators , with for-profit providers being the worst offenders and again, high-level executives drawing enormous incomes. Almost every statement of benefits I receive shows the insurance provider paying nothing, though sometimes negotiating the price down. The cost of insurance and medical care are already at a crisis point, and they want to increase by a double-digit percentage? This will make it impossible for so many people to live here. People like me, who love it here and want to help our beautiful state continue to be as beautiful, fun, weird, and loving as it is. Please do not permit this ruinous price increase! We have a lot of work to do to fix our Healthcare system, and this price increase will have devastating effects on the residents of Vermont and only make it more difficult for people to survive to fix the system. Thank you for your time.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Colin Graybuck

**Town:** South Burlington


**I get my insurance from:** Vermont Health Connect

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

I am opposed to this or any other increase in premium prices. To be absolutely clear I think both BCBSVT and MVP are run by bands of pirates who are flagrantly engaged in anticompetitive price fixing. All of their board, C-level executives and upper management should be in prison. Especially BCBSVT, which HILARIOUSLY claims to be a non-profit, while also hoarding sums of money that would make dragons blush. How dare you even propose an increase in premium prices to the people who you are already holding upside down by the heels and shaking every last penny out of. You should be ashamed, if you were capable of shame, but I long ago gave up any illusion that you are capable of that, or anything approaching human empathy. You are not wringing us dry out of greed, but out of actual malice and hatred for the people who have no choice but to be your customers.





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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Hayley DeLugach

**Town:** Norwich

**I get my insurance from:** Employer (self or household member)

**My insurance company is:** Anthem Blue Cross Blue Sheild of NE

**Comment:**

I think its unfair of insurance companies to raise the costs of premiums so much year to year. The cost is usually passed on to the employee in some form, because small companies can't match the increase and lose money covering the cost. Health care is a need for everyone and should be covered for everyone through the government. If insurance companies want to be part of the coverage, they need to put people ahead of profits and maintain reasonable premium costs without cutting the coverage they provide. By putting the cost on working people inequality increases as more people have significant health care debt, while their real net income goes down with insurance premium increases. More sicker people can afford less and less.

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## 2024 Vermont Individual and Small Group Rate Filing Comment

**Post full comment online:** Yes

**Name:** Heather Fitzgerald


**Town:** Burlington

**I get my insurance from:** Vermont Health Connect

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

My spouse just left his job and therefore our health insurance ended. My jobs do not offer me health insurance, so as of July 1 we are now on VT Health Connect. The entire application process was incredibly stressful--I spent several months wading through all of the options, then met with a navigator because I thought, "Surely there must be a better option that I am not seeing!" (There was not.) He made a small mistake on the application and I spent a week thinking I would have to choose between paying hundreds of dollars a month for premiums for a Bronze plan (so, effectively, no coverage because of the huge deductible) and actual...health care. (I currently eke out a few hundred dollars a month for the out-of-pocket costs for managing my [REDACTED], though our income has dropped considerably, and I am not sure I will even be able to continue to do that.) The people I spoke with at VT Health Connect were extremely professional and helpful and helped me straighten things out after the holiday--turns out we will owe an extremely small amount a month for our premiums (for, remember, zero actual assistance with health care needs for the foreseeable future--but we are going with this "plan" because we cannot afford premiums...sort of like the economics of payday loans, but for health care), but the entire system is a byzantine, Rube Goldberg mechanism and has NOTHING to do with PEOPLES' ACUTAL HEALTH. Furthermore, when people are filling out their applications during the special enrollment period because they had a life event, their incomes are, by definition, in flux and changing. It makes no sense that our income from LAST YEAR is the basis for this decision--it has nothing to do with our current reality--and actually, come to think of it, peoples' incomes have nothing to do with whether or not they deserve to be able to afford health care. I wished so hard during this process that the public option had survived. Our son qualifies for Dr. Dynasaur and what a contrast to our Bronze plan. When the COVID subsidies go away, we will pay \$60/mo for his premium. I was imagining the world where I could pay \$60/mo for each of us and just...get care without worrying about paying the bills afterwards. The worst part of our health care system (if you manage to surmount all the bureaucracy and sign up for a plan that makes any kind of sense for you in the first place--honestly, I needed my master's degree to survive the process) is worrying that your care will not be covered, because often, somehow, it is not. That's because insurance companies are in the business of making a profit, not helping people. So yeah, no, there is no room in my budget for an increase in premiums for this crappy deal. I am incensed that some CEOs making millions of dollars are seeking a rate increase on our backs.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** No

**Name:** Jason Marko


**Town:** Winooski

**I get my insurance from:** Direct through BCBSVT or MVP

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

The average wage increase over the last year was 4.7% in the United States. Increasing the cost of health insurance premiums significantly impacts the average Vermonter in a negative fashion. The consequence of this increase will make it more difficult for the average Vermonter to pay other necessary expenses and also continue to utilize health insurance. The con of increasing premiums is significantly detrimental to the average consumer whereas the con of holding prices steady benefits the public and decreases profit margins for two major companies. I believe the correct decision and greatest benefit to consumers is obvious.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Jessica Gibson


**Town:** Burlington

**I get my insurance from:** Employer (self or household member)

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

I pay \$70 a month for my insurance already. Most months I'm late on my bills. I pay \$1400 for a bedroom in a shared house. Rental prices are outrageous, grocery prices are outrageous, insurance prices are already outrageous. All I can ask is that you reconsider, because I can't afford it. I know many many other Vermonters in the same boat. Please reconsider making medicine and health care more inaccessible. Thank you.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** John Eckerson


**Town:** Westford

**I get my insurance from:** Vermont Teachers State Retirement

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

Given the stress created by inflation the past two years plus the top heavy administration of health insurers, the proposed premium increases are outlandish. None of them reflect the current rate of inflation nor the net profit of the providers.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Kenneth Sullivan-Bol


**Town:** Stamford, VT

**I get my insurance from:** Vermont Health Connect

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

This high of a rate hike is unacceptable! Elevating deductibles, increase in premiums, and decrease in provider reimbursement only further demonstrates that your concern is more to the shareholders than it is to the members and level of benefits that are covered through our already astronomical premiums. \$807 monthly health insurance premium for an individual is robbery, and is more than double of our home and auto insurance premium.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** KRIS


**Town:** CHELSEA

**I get my insurance from:** Vermont Health Connect

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

I'M NOT SURE HOW THIS IS CONSIDERED A REASONABLE INCREASE TO REQUEST CONSIDERING IT IS JUST ONE ASPECT OF AN INDIVIDUAL'S OR BUSINESS'S OVERALL SITUATION. WHEN DO WE BEGIN WORKING TOGETHER TO BRING THE COSTS DOWN? I THOUGHT THE OVERALL GOAL WAS TO GET COSTS UNDER CONTROL. WHERE DOES THIS BEGIN WHEN IT IS MORE THAN THE PATIENTS OR POTENTIAL PATIENTS BEING INSTRUCTED TO CURB CONSUMPTION OF MEDICAL CARE? WHEN DO THE OTHERS INVOLVED (INSURANCE COMPANIES, HOSPITALS, CLINICS, ETC) BECOME ACCOUNTABLE? IT SEEMS THERE IS NOBODY WHO CAN EARN LESS MONEY FROM THE OVERALL SITUATION. WHEN DO WE LOOK AT THE OVERALL PICTURE AND MAKE INNOVATIVE DECISIONS?



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Meghan Orisko

**Town:** Westford

**I get my insurance from:** Vermont Health Connect

**My insurance company is:** MVP

**Comment:**

My father has chosen to purchase health insurance thru Vermont health connect, MVP because a year ago, his wife died in a car accident on slick Vermont roads. My parents were high school sweethearts and because my mom was an educator at Milton schools, their health insurance was affordable. While my mom taught, my dad has worked almost 30 years with the same small construction company. When my mom died, my dad had to purchase health insurance, which costs more than his mortgage. It's hard enough losing his life partner, but also now he's struggling to afford health insurance. If rates increase, he won't be able to afford it.





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## 2024 Vermont Individual and Small Group Rate Filing Comment

**Post full comment online:** Yes

**Name:** Mike Rainville

**Town:** Middlebury

**I get my insurance from:** I am an employer that provides coverage

**My insurance company is:** MVP

**Comment:**

My company is a wood products manufacturer that only stays in business by successfully competing against competition from all over the world. As such we are trained to be efficient and to eliminate waste. As a consumer watching the health system (offices and hospitals) operate, the opportunities to eliminate waste abound. One argument is that their job is to save lives, not money. Another (as stated to an organization that tried to make inroads on efficiency) is that they aren't going to make changes that could jeopardize their budget justifications. From an oversight angle, these arguments should not hold up. Does anyone know what the right service level is? Is it driven by biggest budget the public can possibly bear? Maybe too many medical tests are done or maybe not enough. There are inherent value judgements in this process and I'm not sure this reality is properly considered. Saving waste may not be about money but about better care for the money. GMCB should be focused on making sure we are getting the best for what we are paying. With months long waits to see providers, there is proof that the system is not working.

I would like to advocate for a less expensive health care system. The cost is outrageous and completely unsustainable, yet each year we are to it suck up. Taking a different path is a mindset, not a tradeoff. In my business we compete while maintaining employee safety, product quality, product safety, and environmental safety - better than our competitors. The key is that we operate in an environment that demands we do better, we have no safety net.

Years ago, insurance premiums surpassed the cost of the lumber we use. Now it surpasses all the materials and supplies we use. Or, as another comparison, it costs more than our factory.

Can we be a woodshop, or are we destined to just be a funder of the health care system? The things companies, and individuals, have to forego to pay health costs are staggering. It threatens to make us uncompetitive, not just against China but against other parts of the US. Yet, "the system" can have a gleaming empire up on the hill, and satellites devouring every commercial park. I don't have an answer, I'm too busy trying to make money to pay for the coverage.

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## 2024 Vermont Individual and Small Group Rate Filing Comment

**Post full comment online:** Yes

**Name:** Wendy Leffel

**Town:** Pownal

**I get my insurance from:** Direct through BCBSVT or MVP

**My insurance company is:** Traditional Medicare with BCBSVT gap insurance

**Comment:**

Dear GMCB,

The requested rate hikes are unaffordable and unconscionable. Vermonters already cannot afford the monthly health insurance premiums. What about retired people on a fixed income who need gap insurance for traditional Medicare? How will they afford the annual increases?

As I'm sure you are aware, many people postpone healthcare visits because they can't afford to pay the out of pocket expenses and high deductibles. This works well for insurance companies by reducing healthcare claims. But the increasing cost of addressing medical issues is kicked down the road.

Why is there is a dearth of PCPs in VT? The policies of health insurance companies contribute to a dysfunctional environment that causes doctors and nurses to leave practice. Insurance company policies are directly responsible for much of the moral injury suffered by doctors, nurses and other healthcare workers.

There was an excellent recent article on moral injury and doctors in the NY Times magazine. If you haven't read it yet, you all should. <https://www.nytimes.com/2023/06/15/magazine/doctors-moral-crises.html?searchResultPosition=1>

Increasing insurance premiums will not address any of these vital issues. It will only require people to pay more for increasingly inaccessible care.

Doctors, nurses and patients all want the same thing: to hear the patients, get to the underlying cause and to relieve suffering to the extent possible.

Please, do not support increased health insurance premiums. Rather, hold the companies responsible for addressing the above problems.

Thank you,  
Wendy Leffel



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## 2024 Vermont Individual and Small Group Rate Filing Comment

**Post full comment online:** Yes

**Name:** Eli Coughlin-Galbraith

**Town:** Brattleboro

**I get my insurance from:** Vermont Health Connect

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

We had several health crises this year. Our healthcare has kept us alive. BlueCross BlueShield has held that healthcare hostage over data collection and red tape three times in the past two years. I have spent over 60 hours on hold, made contacts among several different people in various departments of BCBS and VHC, and begged for our lives on the phone about a dozen times. I documented all of my work; I have spreadsheets.

If BCBS had simpler systems, fewer and more generous plans, and less people employed in denying claims and gatekeeping healthcare, they would save more than 15.5%. They certainly would have saved all of the time and work hours I cost them in my desperate crusade to keep myself, my wife, and our newborn child alive.

It's time for them to learn how to cut costs.



1 new GMCB Public Comment has been received.

Submit Time: 7/18/2023 5:44:41 PM

Name: Vermont Chiropractic Association

Email address: vtchiroassoc@gmail.com


Affiliation:

Town/City: Essex

Topic: Health Insurance Rate Review

Comment: Dear Chair Foster and Members of the Green Mountain Care Board, On behalf of our association and the 125+ small businesses owned by Chiropractic Physicians throughout Vermont, I am submitting for public comment our vast disappointment and frustration in learning of the proposed rate increases for the 2024 plan year by BCBSVT and MVP. As you know, this increase is financially disruptive to businesses providing insurance to deserving employees but also to every privately insured Vermonter. Small businesses would be expected to absorb higher premium and claim costs; and the privately insured, higher out-of-pocket and premium costs. All of these additional strains are being requested at a time when many small businesses and Vermonters have had to use their reserves to combat inflation amidst heightened anxiety over increased business costs and an unstable economic future. Adding to this egregious request is the lack of an average 13.8% pay increase for many Vermonters, including Chiropractic Physicians and other deserving provider groups. Vermonters and small business owners have come to the unfortunate realization that healthcare costs will undoubtedly increase each year with very little say in the matter. Public comments have reflected a culmination of frustration and anger but with little favorable outcome. To allow for the burden of yet another double-digit increase would be poor public policy and reverberate with ill regard toward the purpose of the GMCB. Thank you for taking comments on this important issue. Sincerely, Aimee Koch Executive Director

Post Comment: Yes



A new GMCB Public Comment has been received.

Submit Time: 7/23/2023 10:37:46 PM

Name: Sharon Gutwin  
Affiliation: The RehabGYM  
Town/City: Williston

Topic: Health Insurance Rate Review

Comment: Simple math is all that is needed to understand the proposed rate increases do not fit the definition of "affordable". And twisting "affordability" in saying the cost of a catastrophic health emergency would be even more unaffordable without insurance makes no sense as there can only be more people uninsured if they cannot afford premiums to begin with. Discussion in the hearings pointed directly to the hospital(s) and pharmaceuticals being the cost drivers, with chronic disease the fuel. We are witnessing a run-away sick care train with the drivers seemingly oblivious to the fact that their track is unsustainable. It is not acceptable that administrators/executives are paid high salaries, bonuses and benefits in the absence of cost containment and the boards of the hospital(s) doing more to protect those jobs than the job of the hospital(s) to deliver quality care at an affordable price. Vermonters depend on the GMCB to apply the brakes. Limiting payment increases to hospitals will incentivize cost containment. In turn holding insurance companies accountable to sustainable payments to independent providers is necessary when the only place affordability is found is in this shrinking sector of the health care system.

Post Comment: Yes

**A new GMCB Public Comment has been received.**

**Submit Time:** 07/09/2023

**Name:** Sharon Gutwin

**Affiliation:**

**Town/City:**

**Topic:** Health Insurance Rate Review

**Comment:**

I listened to the entire session with MVP and appreciate each of you in your questioning.

My question is why are negotiations of contracts part of executive session when CMS transparency rules now absolves secrecy? All hospitals and insurers are required to be fully transparent about payments. Fines can be levied if this information is withheld. If there are other components to contracts in addition to payments for services I think the public has a right to know.

I provided evidence to the board of the payments to UVMHN vs. The RehabGYM to show the disparity. I have shown my budget, the same percentage of Medicaid and Medicare patients, the same losses in failure to pay, the interns we host...The only difference is I do not have a CTR, high executive pay, high admin costs nor even a profit margin now. My business presently runs off retained earnings...money my business earned in past years that I paid taxes on, but left in the business. My business runs on my retirement. I listened to hours of testimony justifying the need of a profit to be sustainable. I agree!

I hear rates are non discriminatory and recognize it is in reference to covered members but I am experiencing discrimination as a business owner only because I am not a hospital. I have no negotiation rights and given a fraction of what is paid UVMHN...why? No entity regulated by the GMCB is actually at risk...because of the board.

Ironically, it was in 2018 that I testified to the GMCB of insufficient payments to independent PTs. I was asked how long the RehabGYM is likely to survive and my estimate was 5 years....which is now. I spoke about my program in proactive care to treat chronic disease and injury prevention that won the Vermont Business Person of the Year Award. Tom Pelham was impressed enough to get me on the advisory committee. I had hoped I would make a difference in helping Vermont healthcare be better and more affordable. I struggle with that hope now.

If the GMCB wants affordable good quality care, it must stop looking to UVMHN to achieve that. It is like believing the "fox is best to protect a hen house". UVMHN is en route to consume all of Vermont healthcare. Every independent provider lost to UVMHN's appetite is a loss to affordable care. If the RehabGYM comes to an end, so does the number one provider of PT in Vermont and the only PT practice that offers preventative care.

The healthcare system you are charged with includes the RehabGYM. For those it serves and all its employees, please regulate insurers to provide adequate payments to my business with the same consideration it affords hospitals.

Thanks for listening.

sharon gutwin

**Post Comment:** Yes

**A new GMCB Public Comment has been received.**

**Submit Time:** 07/18/2023

**Name:** Miriam Simonds

**Affiliation:**

**Town/City:** Westmore

**Topic:** Health Insurance Rate Review

**Comment:**

We strongly object to proposed health insurance rate increases.

Again, a double digit rate increase over last year, would bring for us a 24% increase in costs that is unquestionably not sustainable.

Please don't let this happen.

Town of Westmore Select Board

**Post Comment:** No

Date: July 21, 2023  
To: Members of the Green Mountain Care Board  
From: Susan Ridzon, HealthFirst Executive Director  
Re: 2024 Rate Review Filings

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HealthFirst appreciates the opportunity to comment on the rate review process. As insurers propose double digit rate increases for small groups and individuals, we again point out that this will further weaken independently owned medical practices and will ultimately decrease Vermonter's access to high value care. We urge the Green Mountain Care Board to limit such rate increases by addressing the root causes, and also to require transparency and fairness in how rate increases are distributed, as we [suggested](#) in 2020.

Yearly increases in health insurance rates uniquely challenge independent practices. The cost of insuring employees increases but payers are not providing concomitant reimbursement increases to practices. Additionally, there are no federal or state subsidies available for small businesses to help pay for health insurance. This results in shrinking or negative practice margins and further decreases the ability of independent practices to attract and keep clinicians and staff when better resourced entities can offer more attractive compensation and loan repayment packages.

Not surprisingly, this dynamic of expenses outpacing reimbursements results in independent practice closures. Twelve of our independent practices have closed over the last five years. That's almost 20 percent of our network. Almost 60 percent of the closures were primary care practices. The closures will continue unless something changes.

Why should Vermont care? Because independent practices are the very practices that deliver high quality care at a much lower cost. When an independent practice closes, Vermonters lose access to the personalized, high value care that these community-based practices deliver. This drives up cost for everyone as the care then shifts into higher cost settings.

What independent practices need is a leveling of the playing field. Our system disadvantages independent practices from many directions. They are forced into high-cost health exchange plans with no option for large group purchasing or subsidies. They have virtually no negotiating power with payers, are paid at rates that haven't kept pace with inflation or expenses, and they are frequently reimbursed far less than hospital-employed physicians for the same services. They are forced to compete with higher paid entities for clinicians and staff, but practices can't increase rates to cover the costs. To stay in business, clinicians need to see more and more patients and work longer and longer hours. It is not sustainable.

We urge the Green Mountain Care Board to put processes in place that will help to support, rather than weaken, Vermont's high value independent practices.

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HealthFirst is Vermont's independent practice association representing 62 physician-owned primary care and specialty care practices located across ten counties in Vermont. We estimate that approximately 85-90 percent of the independent practices in Vermont are HealthFirst members.



**A new GMCB Public Comment has been received.**

**Submit Time:** 07/20/2023

**Name:** Forrest Holzapfel

**Affiliation:**

**Town/City:** Marlboro

**Topic:** Health Insurance Rate Review

**Comment:**

I am the Town Clerk of Marlboro, Vermont, a town of less than 1,500 people. I make a modest salary. Our Select Board has kindly offered the Blue Cross Blue Shield of Vermont Platinum Plan to me (and my spouse) for many years now, the "best" health insurance offered if I understand correctly. I am under 50 years old and in excellent health for which I am grateful. In each of the last few years, basic diagnostic blood work done for annual physicals are no longer covered. The co-pay on office visits and prescription drugs has gone up considerably. Mental health providers in our area are mostly no longer taking insurance. I have deferred dental and vision for years as the town does not offer these benefits, and these are further out-of-pocket expenses. My wife recently needed blood work which left us with an \$800 bill to pay without warning, more than a weeks' pay.

I know that in a catastrophic health event I would have coverage but this is not much solace with more unexpected bills and a feeling of erosion of the benefit. I feel increasingly that switching to Medicare would be a better, more cost effective choice both for myself and the taxpayers who compensate me through the town budget. Thankfully both of my children have had excellent coverage from Dr. Dynasuar due to our household income, and have not been a further burden to the taxpayers of Marlboro. I find the proposed 14.5% increase staggering but I do realize how broken the system continues to be after the pandemic and generally the condition of health care nationwide. When the CEO of Blue Cross Blue Shield of Vermont is listed as making around \$675,000 per year with those just under that position making around \$350,000, I reflect that as a vital public servant I make \$40,000. The Blue Cross Blue Shield website states "For us, health care isn't about profits, shareholders, and politics — it's about protecting and improving the health and well-being of all Vermonters." This philosophy is wonderful in theory, but from my point of view, this ideal is not being met. I know my position is not one of strength in the face of ballooning costs, and that I am not versed in the nuances of playing the system to my advantage. Thanks for the opportunity to share my perspective.

Sincerely, Forrest

**Post Comment:** Yes

**A new GMCB Public Comment has been received.**

**Submit Time:** 07/24/2023

**Name:** Mary Forward

**Affiliation:**

**Town/City:**

**Topic:** Health Insurance Rate Review

**Comment:**

I have been paying for a BCBSVT Bronze level plan for the past two years. What have I received for my nearly \$8000/year payments? A patronizing email every few months telling me how much they care, and 8 rapid COVID tests (but that's not covered anymore). And apparently paying for lobbyists to convince GMCB that they care enough about me to increase my premiums \$1200/year with no additional services. With this "affordable" plan, there's a \$7150 deductible. That means that I have to pay over \$15,000 before insurance pays a penny towards my health. It's catastrophic coverage disguised as a health plan.

When I had employer sponsored health insurance that offered good coverage, I received statements from the insurance company bragging about the low rates they negotiated with providers. For example, I received a statement for a specialist where I had a 10 minute consultation and the charges were nearly \$350, but the insurance company's negotiated rate was \$80. I had a \$50 co-pay, so the insurance company paid \$30, and they proudly showed on the statement how they were working for me by negotiating such a low rate. Now, \$350 for 10 minutes is painfully high, but \$80 is too low when you consider that it has to cover the facility, doctor, nurse, front office staff, etc.

So these low rates negotiated by insurance companies for visits they have to pay for are compensated by higher rates to people to have to pay for care themselves or those who have to meet a deductible before the negotiated rates would kick in.

The first line of BCBSVT's plain language summary is that their mission is to make healthcare work better for all Vermonters. It doesn't work now. How will increasing my rates make it work better? Better would be that I could actually get medical care. A higher premium does not make that happen. It will make it harder for people to do other things they need to do to stay healthy, like buy fresh, good quality food. And it will contribute to poor health by adding additional financial stress to the already stressful situation of being priced out of healthcare.

**Post Comment:**



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## 2024 Vermont Individual and Small Group Rate Filing Comment

**Post full comment online:** Yes

**Name:** Keegan Harris

**Town:** Thetford


**I get my insurance from:** Employer (self or household member)

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

I work as a teacher, and my family get our health insurance through my job. Over the ten years of my career in Vermont, teachers' wages in my district (and around the state) have not kept up with inflation. This is especially true recently, as cost of living increases have significantly outstripped wages. Healthcare costs are driving shrinking staff at schools around our state, and are therefore contributing significantly to crises for workers and families as working and learning conditions deteriorate in the face of staff cuts made to afford these exorbitant rate hikes. These healthcare price increases serve as a veiled assault on public education.

Of course, they are also a naked assault on public health. Raising rates by fifteen percent in a year with an 8.7% COLA is unconscionable and unjust. I don't know of anyone who has gotten an 8% raise in the last ten years, let alone 15%. When fewer people can afford healthcare, more people will die. Approving these rate hikes---or any rate increase---will have deadly consequences. I implore you to deny these proposed price increases.



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## **2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Skylar Maguire


**Town:** Bristol

**I get my insurance from:** Vermont Health Connect

**My insurance company is:** Medicaid

**Comment:**

The price increases are especially unethical at this time of unprecedented suffering for poor people-- which includes much of the working class. Vermonters are often paid starvation wages, without even paid lunch breaks, and our wages fall entirely out of line with the cost of living in comparable areas across the country. The recent floods have further devastated individuals and families by adding more strain on the impossibility of finding a roof over one's head, so we cannot ignore the housing crisis either. While I am currently on medicaid, I am - in a sense -trapped, due to the unaffordability of other options. Medicaid cut offs occur even when someone just barely makes over the "federal poverty guideline limits", which would leave me forced to choose between expensive marketplace plans. This would ultimately sink me deeper into poverty than just making less money and staying on medicaid, factoring in my chronic health conditions which require ongoing care. Healthcare is a human right! I'm outraged our federal and state government is still letting healthcare companies control our lives and well-being. Vermont has the money and resources to provide Healthcare for All and be out of this mess which continues to destroy so many lives. This is a live and death issue. Without a doubt, increased premiums from BCBS and MVP would be a step in the wrong direction. It is time to tackle the cost of healthcare by getting to the root cause: corporations. There must be no more passing the cost off people trying to stay alive and manage their health and well-being. Corporate profits should not matter more than peoples lives.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Claire Kendall


**Town:** Moretown

**I get my insurance from:** Employer (self or household member)

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

On behalf of the Vermont Parent Child Center Network the proposed rate increases are not sustainable. There are some PCCs that historically not been able to afford offering health insurance to their staff. We are 15 agencies small businesses not profit employers averaging 30-40 staff across Vermont employing so social workers and educators and already struggle with retaining staff due to low salaries. We recently received legislative support for a base funding increase to increase salaries and benefits. These proposed rate increases will have a direct negative impact our ability to implement health Benefit plans. If we can't cover individual employee insurance then the cost burden is on the employee who is already struggling to make ends meet. From a non profit perspective these health insurance rate increases will have a very negative impact.



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**2024 Vermont Individual and Small Group Rate Filing Comment**

**Post full comment online:** Yes

**Name:** Paul Ogden

**Town:** Dorset VT

**I get my insurance from:** Vermont Health Connect

**My insurance company is:** Blue Cross Blue Shield of Vermont

**Comment:**

This proposed rate increase will put a huge financial strain on fixed income residents. It cannot be justified, even when considering the economic inflation that our nation has experienced in the last 12 months. This profit grab attempt by BCBS helps to support putting for-profit providers out of business with a nation-wide insurance plan.



1 new GMCB Public Comment has been received.

Submit Time: 7/24/2023 3:14:03 PM

Name: Mark Koenig

Affiliation: Commission On Public School Employee Health Benefits

Town/City: Vergennes

Topic: Health Insurance Rate Review

Comment: Thank you for providing the employer commissioners on the Commission On Public School Employee Health Benefits an opportunity to express their opinion regarding the proposed 2024 double-digit health care increase asked for by Blue Cross Blue Shield of Vermont and MVP. We urge that your board not only take a discriminating look at the details of this request to highlight needed savings, but also that you set in motion a process for addressing the long-term costs of healthcare in our state. This continued rate of increase is not sustainable and is financially devastating to all Vermonters. As an example, look no further than its impact on the cost of medical insurance for our public school educators. The annual premium for the most popular family medical insurance plan offered to public school employees in fiscal year 2018 was \$17,394. After six years of increases (averaging 10% annually), the total premium bill for insuring that same family is \$31,403 in fiscal year 2024. Based on the recent proposals filed by Blue Cross Blue Shield of Vermont and MVP, the premium for that family plan will be almost \$35,000 for fiscal year 2025, and – if this trend continues – will explode to over \$55,000 by the end of the decade. Please note that these premium costs do not include out-of-pocket expenses. This cannot happen. This ongoing issue will continue until we all face up to the basic problem: we don't have a health care system, we have an illness treatment program. Everyone who is part of or utilizes the health care sector — including employers and employees — needs to embrace a comprehensive approach that includes wellness, fitness, preventive care, strategic investments, operational efficiency, and incentives for healthy living. The Green Mountain Care Board must take a leadership position on this issue. Steps to rein in the ever escalating cost of health care in Vermont has to be a top priority. The Vermont Public School Employer Commissioners do not have the expertise or leverage to confront this problem alone. We will, however, eagerly step up to help you in any way we can. The Vermont response to July's catastrophic rain storms and floods demonstrates what Vermonters can do when we all pull together. The soaring cost of our healthcare must be viewed as equally catastrophic, but we can rely on the steadfast will of Vermonters to take necessary steps for a better future. Mark Koenig Chair Vermont Public School Employer Commissioners

Post Comment: Yes