

June 30, 2023

Kevin Ruggeberg, FSA, MAAA  
Vice President & Consulting Actuary  
Lewis & Ellis, Inc.

**Subject: Your 06/28/2023 Questions re:  
Blue Cross and Blue Shield of Vermont  
2024 Vermont ACA Market – Individual Rate Filing (SERFF Tracking #: BCVT-133654578)  
And  
2024 Vermont ACA Market – Small Group Rate Filing (SERFF Tracking #: BCVT-133654592)**

Dear Mr. Ruggeberg:

In response to your requests dated June 28, 2023, here is *your question* and our answer:

- 1. We are aware of an updated actuarial certification from Wakely for the 2024 Standard Plans due to IRS-release final H.S.A. limits for 2024. Please either confirm that the noted revisions are included in the submitted rate filing or list each revision and provide the calculation of the resulting rate impact. If the latter, do not provide fully revised documentation (URRT, Act Memo, Exhibits, etc.) at this time.*

The filings as submitted did not include the revision to standard and non-standard plans due to the IRS HSA limits. The table below show the changes to the benefits and the impact on premiums. As part of DFR's review of the form filing, we slightly modified the Vermont Preferred Silver CSR 73% and decreased the deductible and out-of-pocket by \$25. This is reflected in the impact to rates below as it slightly impacted the silver load factor. Plans with no benefit changes are impacted due to the normalization of the induced utilization and selection factors.

	Plan	Rx OOPM - As Filed	Rx - OOPM Updated	Individual Market	Small Group Market
<b>NON-STANDARD PLANS</b>	Vermont Preferred Gold	\$1,500	\$1,600	-0.07%	-0.06%
	Vermont Select Gold CDHP	\$1,500	\$1,600	-0.03%	-0.02%
	Vermont Preferred Silver	\$1,500	\$1,600	-0.02%	-0.06%
	Vermont Select Silver CDHP	\$1,500	\$1,600	-0.02%	-0.05%
	Vermont Preferred Bronze	Combined	No Change	-0.01%	0.00%
	Vermont Select Bronze CDHP	Combined	No Change	-0.01%	0.00%
<b>STANDARD PLANS</b>	Standard Platinum	\$1,500	No Change	0.00%	0.01%
	Standard Gold	\$1,500	No Change	-0.01%	0.00%
	Standard Silver	\$1,500	No Change	-0.01%	0.01%
	Standard Silver CDHP	\$1,500	\$1,600	-0.02%	-0.03%
	Standard Bronze	\$1,500	No Change	-0.01%	0.00%
	Standard Bronze CDHP	\$1,500	\$1,600	-0.09%	-0.08%
	Standard Bronze Integrated	Combined	No Change	-0.01%	0.01%
	Catastrophic	\$1,500	\$1,600	-0.01%	
<b>REFLECTIVE PLANS</b>	Vermont Preferred Silver - Reflective	\$1,500	\$1,600	-0.07%	-0.06%
	Vermont Select Silver CDHP - Reflective	\$1,500	\$1,600	-0.07%	-0.05%
	Standard Silver - Reflective	\$1,500	No Change	0.00%	0.01%
	Standard Silver CDHP - Reflective	\$1,500	\$1,600	-0.04%	-0.03%
<b>Average Impact</b>				<b>-0.02%</b>	<b>-0.01%</b>

Please let us know if you have any further questions, or if we can provide additional clarity on any of the items above.

Sincerely,



Martine B. Lemieux, F.S.A., M.A.A.A.  
Actuarial Director, Financial Integrity