

**STATE OF VERMONT  
GREEN MOUNTAIN CARE BOARD**

In re: 2023 Standard Qualified Health Plans        )  
and Reflective Silver Plans                            )  
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**ORDER APPROVING MODIFICATIONS TO 2023 PLAN DESIGNS**

The Green Mountain Care Board is responsible for reviewing and approving, with recommendations from the Department of Vermont Health Access (DVHA), the benefit package or packages for qualified health benefit plans and reflective silver plans,<sup>1</sup> including the cost sharing structure or “design” of the plans. *See* 18 V.S.A. § 9375(b)(9). There are currently 28 qualified health benefit plans offered in Vermont by two issuers, 14 standard plans (seven from each issuer) and 14 non-standard plans (seven from each issuer).<sup>2</sup>

Changes to plan designs must be considered annually to ensure the plans comply with actuarial value requirements<sup>3</sup> and other rules. For the standard plans, this is done by DVHA, with the assistance of its contract actuaries and input from a stakeholder group that includes Blue Cross Blue Shield of Vermont, MVP, Northeast Delta Dental, the Vermont Office of the Health Care Advocate, and the Vermont Department of Financial Regulation. By prior order, the Board has allowed DVHA to make certain “minor” modifications to standard plan designs without Board approval. *See* In re: Minor modifications to Vermont Health Connect qualified health plan designs that do not require Green Mountain Care Board approval, May 19, 2014 (effective Oct. 4, 2012).

At a public Board meeting on February 2, 2022, representatives from DVHA presented recommended and alternative standard plan designs for the Board’s consideration.<sup>4</sup> For two of the standard deductible plans, the Bronze Deductible Plan without RX Limit and the Silver

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<sup>1</sup> Reflective silver plans are defined in 33 V.S.A. § 1802(10) and § 1813 as plans that are similar to, but contain at least one variation from, the silver-level qualified health benefit plans offered through Vermont Health Connect that include funding to offset the loss of federal cost-sharing reduction payments. Since 2019, the benefit variation has been a \$5 or 5% higher cost share for ambulance services. This variation will remain unchanged for 2023.

<sup>2</sup> Standard plan designs are the same across issuers while non-standard plan designs may vary by issuer.

<sup>3</sup> Actuarial value is a measurement of the “richness” of a plan or the expected percentage of claims for essential health benefits that an insurer will cover on average under the plan. Qualified health plans are offered at four “metal levels,” Platinum, Gold, Silver, and Bronze, each corresponding to a range of actuarial values.

<sup>4</sup> DVHA’s presentations can be accessed at <https://gmcboard.vermont.gov/board/meeting-information/2022-meetings>.

Deductible Plan, DVHA’s recommended design included reducing co-pays for primary care office visits and mental health/substance abuse office visits to \$0 for the first three visits (combined). DVHA explained that the stakeholder group had considered and discussed making similar changes to the Gold Deductible Plan and the Platinum Deductible Plan but concluded that the benefit would have greater value in the lower metal level plans given their higher copays and deductibles. Board members requested additional information on this topic, which DVHA presented a public Board meeting on February 9, 2022.

On February 9, 2022, the Board voted unanimously to adjust the designs of the Gold and Platinum deductible plans by reducing copays for primary care office visits and mental health/substance abuse office visits to \$0 for the first three visits (combined), as presented by DVHA in Alternative Plan 2 for the Platinum Deductible Plan (see p. 19 of Feb. 9 slides) and Alternative Plan 2 for the Gold Deductible Plan (see p. 22 of Feb. 9 slides). The Board reasoned that doing so did not require significant changes, would make it easier to communicate that the benefit exists, and would remove barriers at all metal levels for these important services. For the remaining plans, the Board approved the non-minor changes included in DVHA’s recommended plan designs (see p. 39 of Feb. 9 slides).

**SO ORDERED.**

Dated: February 11, 2022, at Montpelier, Vermont.

s/ Kevin Mullin, Chair )  
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s/ Jessica Holmes )  
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s/ Robin Lunge )  
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s/ Tom Pelham )  
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s/ Thom Walsh )

GREEN MOUNTAIN  
CARE BOARD  
OF VERMONT

Filed: February 11, 2022

Attest: s/ Jean Stetter  
Green Mountain Care Board  
Administrative Services Director

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