



Non-Standard QHP Approval Process & 2021 Evaluation Criteria

A Joint DVHA, DFR and GMCB Staff Presentation
& Staff Recommendation

February 5, 2020

QHPs: Regulatory Roles & Responsibilities

Green Mountain Care Board (GMCB)

- Reviews and approves, with recommendations from DVHA, qualified health plan (QHP) designs. 18 V.S.A. § 9375(b)
- Reviews and approves, modifies or disapproves proposed QHP rates. 8 V.S.A. § 4062(a)(1); 18 V.S.A. § 9375(b)(6)

Department of Vermont Health Access (DVHA)

- Provides recommendations to GMCB on QHP designs. 18 V.S.A. § 9375(b)
- Certifies that QHPs meet federal and state requirements for being offered on the Exchange. 33 V.S.A. § 1806
- Before making a plan available on the Exchange, determines that the plan is in the best interest of individuals and qualified employers in this State. 33 V.S.A. § 1806(a)

Department of Financial Regulation (DFR)

- Reviews QHP forms for compliance with state and federal insurance regulations. 8 V.S.A. § 4062(a)(1); 33 V.S.A. § 1806(e)(2)
- Provides the GMCB with an analysis and opinion on the impact of a proposed rate on the insurer's solvency and reserves. 8 V.S.A. § 4062(a)(2)(B)

Public Comment

Public Comment

At the January 29th meeting, the Board heard 2 public comments:

1. The process and criteria both mention “value” – what is “value” and “value” for who? The consumer? The issuers?
2. Suggestion that the Board consider the overall number of plans on the Exchange when determining the value of non-standard plan designs

Additional public comment: None received.

Proposed Evaluation Criteria

1. Substantial difference in deductible and/or maximum out of pocket compared to standard plans. (ex., substantial difference in amount of Rx deductible)
2. Substantial cost share difference for one or more highly utilized services compared to standard plan designs (ex., change the applicability of a deductible to a service)
3. Plan structure difference compared to standard plan designs. (ex., change from co-payment to co-insurance for specialty office visits)
4. Enhances innovation (ex., promotes optimal service delivery location)
5. Adds value to the Vermont individual and small business health insurance market (ex., fills a gap identified by consumers)

Discussion

Proposed Evaluation Criteria

1. Suggested criterion (Board) – support of state health care reform efforts
 - Option 1 – add as its own criterion
 - Option 2 – include under/within criterion #4
2. Suggested criterion (Public comment) – overall number of plans on the Exchange

Staff Recommendation

- Staff recommend **approving the Non-Standard QHP Design Approval Process as presented.**
- Staff recommend **approving the Evaluation Criteria, modified to include support of current health care reform efforts in the state.**