



To: GMCB Team  
From: Abe Berman  
CC: Sara Barry, Tom Borys, Aaron Perry, Carrie Wulfman, Amy Bodette, Joan Zipko, Rachel Pilcher  
Date: February 13, 2024  
Subject: FY24 Revised Budget Workbook and Attestation for PCP Funds

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Dear Green Mountain Care Board Team:

Thank you for the opportunity to review the FY24 Revised Budget Workbook (“Workbook”) and Attestation for PCP Funds (“Oath”). This letter is OneCare’s feedback on these items, with a focus on the Oath and the proposed Administrative Budget by Function/Program worksheet (“Worksheet”) contained in the Workbook.

We share the Green Mountain Care Board’s (“GMCB”) interest in promoting innovation and financially supporting providers across the continuum of care that contribute to the success of our Population Health Model. From a process perspective, OneCare’s payment reform models and financial incentives are designed and approved by the Board of Managers of OneCare Vermont to align with payer contracts, OneCare’s strategies, and to support its participants’ diverse needs, including flexibility in how funds are expended.

With respect to the Workbook, generally, since we have not yet received the GMCB’s final FY24 budget orders and the specific findings of fact and order language that they will inevitably contain, OneCare does not feel comfortable providing edits to the Workbook. Specifically, OneCare’s position is that it has provided ample information related to how it allocates resources throughout the budget process. Further, since OneCare does not build its budget or structure financial operations in the manner contemplated by the Worksheet, attempting to segregate its work effort and finances in this manner would significantly increase complexity and decrease reliability. By way of example, most staff, if not all, contribute to each functional area on the Worksheet. This means the salary expense for each individual throughout the organization would need to be divided and allocated to the appropriate functional areas. This same exercise would need to take place for every other financial transaction including those related to software, supplies, travel, and all other operating costs. Because this approach would rely heavily on estimates and is operationally impracticable, the results of this exercise would yield information in which OneCare does not have a great deal of confidence.

Regarding the Oath, OneCare has appealed to the Vermont Supreme Court a similar GMCB order requiring OneCare to gather attestations and spending allocations from hospitals on the same subject matter. That appeal is, to date, unresolved; and it would be premature for OneCare to take any action on a matter so closely related to the issue on appeal. Further, since directing participating providers to expend funds in the manner contemplated by the Oath is not something the OneCare Board of Managers has felt is necessary or advisable and is not a current contractual obligation, and since OneCare is unable to attest to the use of funds by third parties over which it does not exercise such control, OneCare does not believe editing the Oath would produce the results that the GMCB would hope to see. For all of these reasons, OneCare is unable to provide edits to the Oath at this time.

Once OneCare receives the GMCB’s written budget order and supporting findings of fact, it may be able to offer additional feedback. OneCare would, of course, be open to discussing these matters further with the GMCB and is willing to sit down in person and do so.