

December 6, 2018

Kevin Mullin, Chair  
Green Mountain Care Board  
144 State Street  
Montpelier, VT 05602

Dear Chair Mullin and Members of the Green Mountain Care Board:

Bi-State Primary Care Association proudly supports the goals of the All-Payer Model (APM) waiver and is actively engaged in collaborative efforts to ensure that primary and preventive care services are fully aligned with value-based payment models. Bi-State's members provide primary, preventive, oral health, mental health, and substance use disorder treatment services for over one-third of Vermonters, reaching the underserved, regardless of ability to pay, throughout our urban and rural communities.

We believe that community-based, accessible, and affordable primary care for all Vermonters is the foundation for successful health reform in Vermont, and for the attainment of the All-Payer Model goals. We support increased investments in comprehensive, integrated primary preventive care that will cost-effectively improve the health of all Vermonters.

At this point in the evolution of payment and delivery system reforms in Vermont, we see numerous opportunities to increase investments in primary preventive care, enhance local community collaborations, and continue expansion of enabling services, such as those provided through the federally-qualified health center and rural health center delivery models.

We support the GMCB's review and consideration of the APM implementation and ACO activities to ensure there are appropriate investments in comprehensive primary and preventive care and systemic efforts to address the impact of social determinants of health on individual Vermonters. We also encourage the GMCB to ensure that community providers are fully consulted in the APM implementation and ACO activities.

We look forward to continuing to improve the health of Vermonters and ensure Vermonters can access necessary, comprehensive primary care services.

Sincerely,

A handwritten signature in black ink, appearing to read 'GJM', followed by a long horizontal flourish.

Georgia J. Maheras, Esq.  
VP, Policy and Programs