



# ACO Certification Eligibility Review for OneCare Vermont

## Staff Recommendations

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# Agenda

- Staff Recommendations
  - New Accountable Care Organization (ACO) certification requirements
  - Certification eligibility verification
- Public Comment: The Board received no public comment on the 2019 certification review
- Discussion & potential vote

# Staff Recommendations: New Certification Requirements

Staff conclude that the new ACO certification requirements added to 18 V.S.A. § 9382 **are being met.**

**We recommend the Board vote to approve OneCare's continued eligibility for certification, subject to reporting and monitoring requirements for the new certification requirements:**

1. Mental Health Access
2. Fair and equitable payments that minimize differentials among participating providers (referred to as "payment parity")
3. Addressing childhood adversity and promoting resilience.

# Mental Health Access

## Certification recommendations for mental health access:

- Staff observe that OneCare is currently working, within its role as an ACO, to ensure that its attributed patients have equal access to appropriate mental health care as part of an integrated, holistic system of care.
- We recommend the Board continue to **monitor** OneCare's performance on mental health-related quality measures contained in payer contracts, as well as its 2019 Quality Improvement Plan and 2019 Clinical Priorities.
- We recommend that OneCare submit a **report** regarding its collaboration with the Designated Agencies on a 42 CFR Part 2 common consent and re-disclosure process.

# Payment Parity

## Certification recommendation for payment parity:

- Staff observe that OneCare is currently working, within its role as an ACO, to establish appropriate mechanisms to receive and distribute payments to its participating health care providers in a fair and equitable manner and to minimize differentials in payment methodology and amounts among comparable participating providers across all practice settings.
- As part of the 2019 OneCare budget approval, the Board voted to require final reporting on the 2018 Comprehensive Payment Reform Pilot and interim reporting on the 2019 Comprehensive Payment Reform Program.
- Staff recommend these budget conditions satisfy monitoring for this certification requirement.

# Childhood Adversity and Resilience

## Certification recommendation for childhood adversity and resilience:

- Staff observe that OneCare is currently working, within its role as an ACO, to provide connections and incentives to existing community services for preventing and addressing the impact of childhood adversity, collaborate on the development of quality-outcome measurements for use by primary care providers and to foster collaboration among care coordinators, community service providers, and families.
- We recommend that OneCare provide a timeline for its 2019 plan to address childhood adversity. This should include reporting on the projects highlighted in this section, including: 1) creation of new social determinants of health risk scores; 2) how ACEs screening tools are being incorporated into EHRs; 3) the DULCE program expansion; 4) how OneCare will use its analytic capacities to identify cost and utilization drivers to help justify additional resources for childhood trauma, and any additional initiatives OneCare will be starting.

# Staff Recommendations: Certification Eligibility Verification

## Antitrust guidance

OneCare attested under oath in their Oct. 1, 2018 certification submission that they are in compliance with the Board's guidance on potential violations of state and federal antitrust laws. **No Board action is required to continue certification.**

## Material Changes

Staff concluded there are no changes that affect OneCare's continued eligibility for certification. **No Board action is required to continue certification.**

# Staff Recommendations: Monitoring & Reporting

Staff will request that OneCare report the following items to the GMCB to support ongoing monitoring (reporting due dates in parentheses). **No Board action is required.**

- An updated Board of Managers roster (30 days after the end of Q1 2019)
- 2020 Network Development strategy and timeline (30 days after the end of Q1 2019)
- 2019 Clinical Priorities (30 days after the end of Q1 2019)
- Quality Improvement Management Workplan (30 days after the end of Q1 2019)
- Updated OneCare Policies and Procedures (various; 30 days after the end of the Quarter in which the policy was approved by the BOM)

# Discussion and Vote

# Statutory Language

**Mental Health Access.** *The ACO ensures equal access to appropriate mental health care that meets the Institute of Medicine's triple aims of quality, access, and affordability in a manner that is equivalent to other aspects of health care as part of an integrated, holistic system of care. 18 V.S.A. § 9382(a)(2).*

**Payment Parity.** *The ACO has established appropriate mechanisms to receive and distribute payments to its participating health care providers in a fair and equitable manner. To the extent that the ACO has the authority and ability to establish provider reimbursement rates, the ACO shall minimize differentials in payment methodology and amounts among comparable participating providers across all practice settings, as long as doing so is not inconsistent with the ACO's overall payment reform objectives. 18 V.S.A § 9382(a)(3).*

**Addressing Childhood Adversity and Promoting Resilience.** *The ACO provides connections and incentives to existing community services for preventing and addressing the impact of childhood adversity. The ACO collaborates on the development of quality-outcome measurements for use by primary care providers who work with children and families and fosters collaboration among care coordinators, community service providers, and families. 18 V.S.A. § 9382(a)(17).*