
DELIVERED ELECTRONICALLY

December 20, 2022

Tom Borys, Vice President of Finance
OneCare Vermont
365 Mountain View Dr, Suite 103
Colchester, VT 05446

Dear Mr. Borys:

The GMCB appreciates your participation in the meeting with CMMI today to discuss the concerns about the base spend being used for the 2023 Medicare Benchmarks expressed in a letter sent by the Board of Managers on December 16th, 2022. At the meeting, CMMI and OneCare agreed that they are very close in their actuals for the population attributed to the ACO for the current performance year.

As OneCare's network has a new entrant in 2023, there are a new set of claims that OneCare will not be able to receive until after the Participation Agreement is signed. Additionally, CMMI is removing beneficiaries from the base expenditures if they have enrolled for Medicare Advantage for 2023 to add stability to the Benchmark. These population differences likely explain some of the discrepancy in the estimates.

Aside from population differences, the approaches being taken by OneCare and CMMI differ based on adjustments and their underlying assumptions. One significant difference in assumptions rests in the estimates for expenditures in the last quarter of 2022. OneCare is estimating a higher amount of incurred, but not reported expenditures than the model being used by CMMI.

The actual experience for 2022 cannot be calculated with actual experience until the next performance year has started. Once more data are available, the GMCB will review the current estimate to determine its accuracy. If the estimate appears inaccurate, the GMCB will collaborate with CMMI to rectify it.

One of the challenges of the current methodology is the adjustment made for attributed beneficiaries who incur more than half of their primary care expenditures outside of the OneCare Vermont service area. This adjustment for qualified evaluation and management services is designed to protect the ACO. The trade-off of this mechanism is the uncertainty it adds to the final expenditures. The GMCB will support efforts to alter this methodology in future years to optimize for a more predictable financial target.

Sincerely,

Sarah A. Lindberg, Director of Health Systems Finance
Green Mountain Care Board



cc: Anya Rader Wallack, Chair, OneCare Board of Managers
Thomas W. Huebner, Vice Chair, OneCare Board of Managers

