

Short-Term Extension of Current APM Agreement

November 28, 2022

11/16 Board Meeting



- Staff presented the terms of the negotiated (but unsigned) agreement to extend the APM Extension for one year, with an additional transition year at Vermont's option.
- If signed, this would extend the APM through 2023 or 2024. The extension period would provide a bridge to a potential new federal-state model (currently in development) likely to start in 2025.
 - [Vermont APM Extension Summary](#)
 - [Full Amended and Restated Vermont All-Payer ACO Model Agreement](#)
- AHS (one of the Board's two APM co-signatories, with the Governor) has indicated support for the extension agreement:
 - [Memo from Agency of Human Services Regarding All-Payer Model Extension](#)

Public Comment



- One verbal comment was offered at the 11/16 Board meeting:
 - Susan Aranoff
- 2 written comments were received as of 11/27:
 - Robert Hoffman (received 11/16/22)
 - Don Tinney, Deb Snell, Betty Keller, Avery Book, Sarah Launderville, Karen Topper, Mollie Wills, Kirsten Murphy, Deb Richter, Julie Wasserman, and Patrick Flood (received 1/4/22)

Public Comment – Themes



- GMCB Role in APM Agreement
- Risks of Continuing APM Agreement

Additional Context on GMCB Role



- Generally, CMMI has required that states engaging in All-Payer Model Agreements (Maryland and Pennsylvania, in addition to Vermont) leverage independent regulatory agencies; in Pennsylvania, the state stood up a new agency for this purpose.
- Involvement of an independent regulatory agency in a federal-state agreement ensures independence when the state is asked to stand in the shoes of Medicare (as GMCB does when we propose the Medicare benchmark each year) and supports achievement of model goals through the agency's regulatory levers. In Vermont, GMCB data and analysis are critical to APM reporting.
- GMCB's regulatory duties, like the duties of any regulatory agency, are in service of state goals; GMCB's duties and goals are laid out in Act 48. The APM goals are well aligned with GMCB's statutory mission.

Staff Recommendation



Approve the Amended and Restated All-Payer ACO Model Agreement, which extends Vermont's agreement and delegate the decision to accept or reject the optional 2024 transition year to the Chair.

- NOTE: If the Board chooses not to delegate the decision on the optional 2024 transition year, this topic will come back before the Board at a public meeting in spring 2023.