

Proposal to Request 1-Year Extension of Current APM Agreement

December 15, 2021



12/1 Board Meeting



- GMCB and AHS staff presented a proposed request to extend the current All-Payer Model (APM) Agreement by one year (through 2023)
 - Proposed [Request Letter](#) and [Agreement Redline](#)
 - Proposal also includes modifications to reflect AHS's APM Implementation Improvement Plan (late 2020) and feedback from the ACO and providers, including:
 - Developing unreconciled fixed prospective payments for the Medicare program, mirroring DVHA's Vermont Medicaid Next Generation (VMNG) ACO program, with guidance for critical access hospitals
 - Moving Medicare's continued Blueprint and SASH investments out of the Medicare ACO benchmark and shared savings calculations, and instead flowing through AHS directly
 - Proposal maintains the APM Agreement's current performance and reporting framework
- This proposal is not intended to replace a proposal for a longer-term subsequent APM Agreement
 - A one-year extension allows the State to more fully engage with providers, payers, advocates, and Vermonters in developing a proposal for a longer-term agreement renewal (likely a 5-year term), which has been hampered by COVID-19

Addition to Proposal



- At AHS's suggestion, staff propose adding the following statement to the cover letter (updated draft included as meeting materials):

Vermont intends to request a Waiver under Section 8 of the current Agreement in 2022 to allow for Medicare reimbursement for Licensed Alcohol and Drug Counselors, Licensed Clinical Mental Health Counselors, Licensed Psychologists, Licensed Psychiatric Nurses, and Licensed Marriage and Family Counselors. Given the challenges of recruiting a mental health and substance use disorder treatment workforce and the prevalence of mental health and substance use conditions in Vermont, the Medicare restriction of credentialing only LICSWs and PhD Psychologists limits access to care for Medicare beneficiaries.

- Staff believe the State could seek a waiver to allow for this under Agreement provisions; no changes to proposed redline required.
- [Updated Request Letter](#)

Proposed Next Steps

- If the Board approves moving forward with this request, the draft request letter will be finalized and submitted
- This would be the start of a negotiation process between Vermont and the Center for Medicare and Medicaid Innovation (CMMI)
 - Once negotiations were complete, a legal agreement documenting the extension would be drafted
 - The Board would review this legal agreement at public meetings, accept public comment, and vote on the final extension documents; today's potential vote is focused solely on the extension request
- Staff would seek to finalize extension negotiations as early as possible in 2022 to allow State and stakeholder focus to shift to planning for longer-term subsequent Agreement

Public Comment



- Three verbal comments at 12/1 Board meeting:
 - Susan Aranoff
 - Jeff Tieman
 - Walter Carpenter
- One written comment:
 - Ellen Oxfeld

Staff Recommendation



Request a one-year extension of the current APM Agreement as presented on December 1, 2021, with the addition of language regarding mental health and substance use disorder treatment providers presented on December 15, 2021.