

February 2, 2023

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Green Mountain Care Board
144 State Street
Montpelier, VT 05620

Dear Members of the Green Mountain Care Board,

In the OneCare Vermont (OCV) revision narrative, the OCV management team asserts that *“BCBSVT’s decision destabilized independent primary care practices participating in the program.”* We take exception with this characterization of events and would like to remind the GMCB that OCV made a change to its data management structure but failed to put in place adequate security policies to enable us to move forward in 2023. On behalf of our members, we are obligated to diligently protect and secure all confidential information and ensure data privacy – without exception.

Since 2019, Blue Cross VT has made a flat per member per month (PMPM) care coordination payment to OCV, based on attributed lives, intended to support primary care practices participating in reform efforts. In fact, we made these payments on behalf of the full membership of self-funded employers, even those who chose not to participate in the program in an attempt to bolster the All Payer Model, provide additional funding for primary care, and jump start health care reform for Vermonters with commercial health insurance coverage. We believe this reflected our commitment to the success of program.

Blue Cross VT recognizes that primary care providers are a critical component of Vermont’s health care system and provide vital care to our members. To avoid negatively impacting primary care, especially independent providers, Blue Cross VT committed to continuing these PMPM care coordination payments for the first half of 2023 while we evaluate options for the remainder of the year and into the future. The payments will be made quarterly, directly to the practices, in the same amount that we contributed in 2022. We must always evaluate the critical balance between the value to our members and our support for providers.

It is our understanding that OCV provides additional payments through its coordination fee and their Comprehensive Payment Reform (CPR) payments to primary care practices. Blue Cross VT

does not supply the funding for these programs. These payments have always been at the discretion of OCV and there is nothing prohibiting OCV and its affiliated entities from continuing these payments in equivalent amounts to participating primary care practices in 2023. The policy decision to continue to stabilize primary care with these payments is the responsibility of OCV.

Finally, the cost and quality measures cited in the [Resubmission Context](#) document are almost exclusively related to public programs. As part of our focus on affordability, we carefully weigh every expense against demonstrable results in both cost and quality. When we think of the impact of premiums, we think of our neighbors and their employers, who are predominantly small Vermont businesses. Vermont being the lowest spend Medicare state in the nation means an increased reliance on a commercial premiums.

Blue Cross VT continues to represent our members and ensure that health care reform includes improved quality outcomes at a lower cost to regular Vermonters, while steadfastly protecting the confidentiality of their health care data. We thank the Green Mountain Care Board for your ongoing efforts to strike this same essential balance.

Sincerely,



Sara Teachout
Corporate Director, Government and Media Relations