



Office of the Health Care Advocate
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March 18, 2024

To: Vermont Agency for Human Services (AHS) and Green Mountain Care Board (GMCB)

Re: Formal Request to Make AHEAD Application Public

From: The Office of the Health Care Advocate (HCA)

Dear Secretary Samuelson and Chair Foster:

The Office of the Health Care Advocate (HCA) has been made aware that the state does not plan to make Vermont's AHEAD application public. Simply put, we believe this is a mistake. In the interest of transparency and public accountability, the HCA advocates that the application be made public. In the HCA's view, the benefits of making the application public far outweigh any potential risks to revealing competitive or sensitive material. With sufficient justification in line with Vermont's Public Records Act, these components could be redacted.

There is a significant amount of fear, distrust, and confusion among many members of the public, providers, hospitals, insurance carriers and legislators about the AHEAD model, the application process, and what it could mean for Vermont. Many of these concerns are strikingly similar to those expressed when the state previously applied for and implemented the VT All-Payer Model (APM). The APM process was perceived by many at the time as insufficiently responsive, inclusive, and transparent to the public.

The HCA fully understands that if Vermont is selected for the model, that negotiations will be private. However, it is in the state's interest to begin to address these concerns by making the application public. If the AHEAD model is as potentially consequential of a reform effort as some have indicated, then the public deserves to know what the state hopes to achieve. The public also should have the right to provide informed input before any potential negotiations on the agreement take place.

Thank you for your consideration.

Sincerely,

s\ Mike Fisher, Chief Health Care Advocate

s\ Sam Peisch, Health Policy Analyst