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June 26, 2023

Owen Foster
Chair, Green Mountain Care Board
144 State Street, Montpelier, VT 05602

RE: HCA Comments on FY24 OneCare Vermont Budget Guidance

Dear Chair Foster and Members of the Green Mountain Care Board:

The Office of the Health Care Advocate (HCA) thanks the Green Mountain Care Board (Board) and its Accountable Care Organization (ACO) budget staff for the important edits and updates made to the FY24 OneCare Vermont's (OCV) budget guidance. The HCA broadly supports the budget guidance before the Board. We recommend that the Board make two small revisions:

1. Modify target 6 to include Directors, as many OneCare executives have this title rather than VP or above. We recommend that the Board choose the peer group or data source for the 50th percentile benchmark to ensure that the intention of this guidance is met.
2. Modify target 7 to require that 100% of executive variable pay be tied to OCV's achievement of "specific and measurable goals."¹ By tying only 40% of variable executive compensation to measurable outcomes, the Board risks unintentionally creating a lower standard of evaluation than is outlined and intended in statute. If the intent and purpose of variable pay is to encourage improved performance, it seems reasonable to set this percentage at 100%.

The HCA recommends that the Board reject OCV's request to remove the budget targets outlined in the guidance in the interest of accountability, transparency and population health. We additionally request that the Board schedule a public hearing to allow Vermonters, the Board, and the HCA an opportunity to ask important questions of UVMHN and OCV's leadership regarding their data analytics contract.

Thank you,

The HCA Policy Team

s\ Mike Fisher, Chief Health Care Advocate
s\ Sam Peisch, Health Policy Analyst
s\ Charles Becker, Staff Attorney
s\ Eric Schultheis, Staff Attorney

¹ GMCB Rule 5.000.