

June 26, 2023

Dear Green Mountain Care Board Team,

We do not believe that any of the requested individual employee information is relevant to the Board's task of setting budget guidance for Accountable Care Organizations. Nor do we believe that it is properly within the Board's statutorily-defined purview to cap individual expenditures by an ACO as part of the budget setting process, particularly when those expenditures implicate strategic decisions reserved exclusively to an ACO's governing body. We understand that, at the request of Board members, the GMCB staff is currently preparing an analysis of the legality and wisdom of the Board setting budget guidance that purports to set limits on individual ACO spending decisions, the details of which will appropriately not be within a regulator's knowledge or expertise. We look forward to receiving the benefit of that analysis at the Board's next meeting.

In the meantime, in response to your question, we can confirm that the current compensation of OneCare's leadership (Directors, Vice Presidents, and CEO) closely conforms to the objective benchmarks utilized by OneCare in setting compensation levels – and the aggregate compensation of that same group of employees is slightly below the blended benchmarks. Of course, any individual's compensation is also a product of many factors that are unique to that employee including tenure, internal equity, and performance. We also remind the GMCB that on May 9<sup>th</sup>, 2023 OneCare responded to GMCB certification questions regarding our strategic approach to compensation. Further, we included required compensation amounts for all director level positions and above in both the original and revised budget submissions to the GMCB. We believe this information provides transparency to the current rates of pay required to remain competitive in the market as well as the recruitment and retention strategy implemented by the OneCare Board of Managers.

Respectfully,

Abraham Berman

Interim Chief Executive Officer, OneCare Vermont

CC: OneCare Board of Managers