



OneCare Vermont

June 21, 2023

Dear Green Mountain Care Board Team,

OneCare Vermont (“OneCare”) is in receipt of the GMCB’s draft FY24 Budget Guidance, provided to OneCare on June 1, 2023. As we discussed in advance with GMCB staff, the suggested timeframe for response to staff was too tight to allow for OneCare’s Board of Managers to provide feedback, so we are taking the opportunity to provide it now via public comment.

The draft FY24 Budget Guidance contained many updates, including nine proposed budget targets. Most of these proposed targets concern strategic elements of OneCare’s operations; so OneCare management was required to seek and receive direction from its Board, which exercises ultimate authority over OneCare’s strategic matters in accordance with Section 5.202(a)4 of Rule 5.000. After review and discussion, OneCare’s Board concluded that most of the targets (e.g. proposed targets 1-2 and 4-9) implicate the strategic direction of OneCare. Further, target six also implicates 5.403(b) of Rule 5.000, which reinforces the principle that it is an ACO’s strategic decision whether and how much risk it wishes to take.

OneCare’s Board has expressed openness to considering the GMCB’s proposed targets as it works to implement its FY24 strategic plan (passed in June 2023) and would welcome an opportunity for further discussion about how to achieve mutual goals. Because there is potential for incongruity between the proposed targets and the Board’s strategic direction for OneCare, we respectfully request that the proposed targets be removed from the final FY24 Budget Guidance.

Respectfully,

Abraham Berman
Interim Chief Executive Officer, OneCare Vermont