



To: Sara Kinsler, Marisa Melamed, Russ McCracken, Michelle Sawyer, Jennifer DaPolito, and Health Care Advocate Policy Team
From: Sara Barry
CC: Vicki Loner, Tom Borys, Josiah Mueller, Amy Bodette, Joan Zipko, Rachel Pilcher
Date: March 31, 2023
Subject: Response to GMCB Benchmarking Memo: Status of Medicare ACO Performance Benchmarking Report and report guidance for March 31 budget resubmission (FY23 Budget Condition #1)

Dear Green Mountain Care Board and Health Care Advocate Policy Teams:

This memo is in response to the GMCB's memo entitled "Status of Medicare ACO Performance Benchmarking Report and report guidance for March 31 budget resubmission (FY23 Budget Condition #1)" received on February 28, 2023.

Enclosed, please find:

- Attachment A: Responses to specific questions contained in the GMCB's February 28, 2023 memo;
- Attachment B: Updated deliverables timeline illustrating ongoing collaboration with GMCB in furtherance of the Budget Order;
- Attachment C: Benchmarking report executive summary;
- Attachment D: Updated benchmarking report that meets the GMCB's requirements outlined in the February 28, 2023 memo.

The focus of this memo and attachments is to clarify questions from GMCB staff and to provide an updated benchmarking report that meets the latest clarifications and specifications detailed in the correspondence from GMCB staff in January 2023. As such, we believe it is important to note two major differences in the enclosed report:

- The GMCB requested the creation of a National All ACO Cohort (all 513 ACOs) with 50th and 90th percentile benchmarks. OneCare's vendor has provided this update, however continues to advise against the utility of this information, instead recommending OneCare use the National Peer ACO Cohort to identify areas of strength and opportunity and engage our network. To identify this National Peer ACO Cohort, as stated in OneCare's October 2022 submission, the vendor independently identified five criteria that created a "like" comparison. Absent this criteria, the comparison to the National All ACO Cohort is less applicable due to the inclusion of unrelated ACO business models such as shared savings only, specialty networks, and other narrow geographic networks that diverge significantly from the work of OneCare and the State of Vermont to achieve scale through a broad and inclusive engagement strategy.

- The GMCB also requested the calculation of the 90th percentile benchmarks occur for each separate metric, effectively finding a small set of possible top performers for each of 67 metrics. Again, OneCare's vendor advises against this strategy as an unrealistic comparator that ignores the interdependent levers at play in health systems, including key dynamics such as the local availability of services (e.g., post-acute care) and its impact on cost, quality, and utilization.

A broad health systems approach to assessing top performers is more useful for comparison and improvement purposes. Recognizing the latest requested updates from GMCB and the expert advice from our vendor, OneCare is producing separate reports for GMCB that incorporate its requirements for a National All ACO Cohort and, in the interest of transparency, OneCare will continue to supply reports that contain benchmarks for the National Peer ACO Cohort. For ACO network performance improvement, OneCare will continue to use the National Peer ACO Cohort for benchmarking and to identify best practices from these more similar high-performing ACOs.

It is also worth noting that these benchmarking data stand alongside ongoing and consistent comparative analyses conducted by NORC through their annual independent evaluations. For example, both sources found Vermont providers in the ACO have reduced spending relative to their comparison groups. Please see the attached reports for 2019-2021 and the accompanying executive summary for additional detail and key findings of both strength and opportunity.

OneCare looks forward to continued collaboration with the GMCB so we can assess, learn, and improve from this comparative information.

Please confirm receipt and let us know if you have any questions.

Attachments (4)