



To: GMCB Team and Health Care Advocate Policy Team
From: Sara Barry
CC: Abe Berman, Tom Borys, Carrie Wulfman, Aaron Perry, Amy Bodette, Rachel Pilcher
Date: March 15, 2024
Subject: Extension Request: ACO Performance and Benchmarking Results

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

Per Budget Order Condition 1, OneCare must submit an updated benchmarking report to the GMCB by March 31, 2024. Per the ACO Reporting Manual, this is to include additional information describing beneficiary risk levels of all cohorts across reporting years and statistical significance testing.

We appreciate the opportunity to have met with GMCB staff on March 11, 2024 to discuss and clarify the scope and substance of these additional items. Based on conversations to date, OneCare and its vendor have sufficient clarity to produce the new beneficiary risk levels data requirement. As discussed, additional meetings will be needed with GMCB to finalize the approach to statistical significance testing. We will be reaching out shortly to schedule a next meeting.

In addition, we would like to take this opportunity to clarify the scope of the data included in the Spring and Fall reports. OneCare's vendor has clarified the timing and availability of CMS data necessary to produce these reports. In essence, the prior Fall's benchmarking data becomes available from CMS the following summer and then goes through a process by the vendor to ingest and normalize the data before new reports can be produced. Similarly, the creation of a new benchmark for the prior performance year begins in a similar timeframe, albeit with incomplete data (and therefore won't be finalized until the following summer). Given this information, the initial report submission for 2024 will only contain the additional beneficiary risk level information requested. The Fall report will contain refreshed 2022 data, newly ingested 2023 data, beneficiary risk levels, and statistical significance testing.

OneCare is submitting requests to:

- Extend the initial 2024 report submission date from March 31, 2024 to April 30, 2024 in order for OneCare's vendor to receive data from CMS, analyze, revise reporting, and conduct appropriate external data quality assurance processes to allow for this report, including beneficiary risk levels, to become a public document.
- Delay submitting statistical significance testing to the September report to allow a continuation of the conversation between the GMCB staff, OneCare and its vendor regarding technical specifications to meet the statistical significance requirement of the GMCB.

Thank you for your consideration. Please let us know if you have any questions.