

Comprehensive Payment Reform (CPR) Program Report to Green Mountain Care Board July 2023

CPR Program Description

The Comprehensive Payment Reform (CPR) program is OneCare's payer-blended fixed payment model for independent primary care practices. CPR involves replacing (and supplementing) feefor-service payments from multiple payers with a single fixed monthly payment from OneCare. Currently, fixed payments replace fee-for-service (FFS) for the Medicaid and Medicare programs, and for 2023 (in response to Blue Cross declining to contract with OneCare), supplemental CPR payments are being made to CPR participants on top of fee-for-service payments from MVP to mimic a CPR-like experience for MVP-attributed lives.

Payer-blended global per member per month (PMPM) payment rates are set based on an evaluation of all independent primary care in the OneCare network, with separate PMPM payments for core codes/services (standard E&M codes that all primary care practices bill) and non-core codes/services (more variable across practices, e.g., lab, behavioral health, radiology).

PMPM payment rates for core services are calculated based on a governance-approved Primary Care Spend Rate (PCSR) target, e.g., a percentage allocation of the total cost of care. For the 2023 program year, the base PCSR is 8.0% of the TCOC, and the opportunity to participate in a mental health screening and staffing model offers practices the opportunity to earn payment as high as 9.0% PCSR. In 2024, OneCare management is pursuing an increase of the base PCSR to 9.0%, with CPR Participants eligible to earn as much as 10.0% of the TCOC for staffing mental health providers in the primary care setting. The final rate will be established through the OneCare budget process later this summer. PMPM payment rates for non-core services are paid via prospective PMPM payment, and are reconciled to 105% of fee-for-service at year's end.

Payment rates are segmented for adult and pediatric patients to fairly accommodate pediatric, family, and adult practices. Rates are risk-adjusted, utilizing the John Hopkins Risk Adjustment Model for adult patients and an age/gender risk matrix for pediatric patients.

Last, a \$5.00 primary care incentive payment is added to the monthly PMPM payment amount for adult and pediatric core services. The funding approach taken by OneCare combines fixed payment dollars from the payers with a substantial supplemental investment by OneCare hospital participants.

Source of Funds for the CPR Program

The CPR Program is funded in part by allocation of funds from the fixed payments OneCare receives from contracted payers. The following table reflects the historical apportionment of those funds between the hospitals and those participating in the CPR program:

| | | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 |
|-------------|-----------|---------------|---------------|---------------|---------------|---------------|---------------|
| Modicare | Hospitals | \$171,951,631 | \$231,717,813 | \$222,876,298 | \$252,895,038 | \$260,810,024 | \$272,431,245 |
| Medicare | CPR | \$1,171,946 | \$1,975,095 | \$2,141,315 | \$2,405,320 | \$2,416,485 | \$2,336,828 |
| | | | | | | | |
| Medicaid | Hospitals | \$65,458,679 | \$110,467,705 | \$129,616,685 | \$118,479,958 | \$143,570,973 | \$181,503,460 |
| Traditional | CPR | \$1,597,453 | \$2,080,498 | \$2,476,281 | \$2,807,056 | \$4,476,627 | \$6,982,128 |
| | | | | | | | |
| Medicaid | Hospitals | n/a | n/a | \$33,906,397 | \$25,536,868 | \$24,428,995 | |
| Expanded | CPR | n/a | n/a | \$179,011 | \$352,152 | \$403,865 | |
| | | | | | | | |
| DCBC OHD | Hospitals | n/a | n/a | \$4,241,052 | \$4,800,000 | \$4,653,851 | n/a |
| BCBS QHP | CPR | n/a | n/a | n/a | \$880,028 | \$793,662 | n/a |

^{*} Medicare and BCBSVT QHP Fixed Prospective Payments (FPPs) are reconciled back to fee for service (FFS) (the table reflects pre-reconciliation figures). However, OneCare does not reconcile the FPP with CPR practices and allocates any balance to hospitals. Medicaid 2023 excludes Surgery Center FPP and Traditional and Expanded cohorts are combined.

In addition, payer-funded population health investments and hospital investments contribute to the funding model. The following table displays the full scope of funding for the participants in the program:

| | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 |
|-----------------------------|-------------|-------------|-------------|-------------|-------------|--------------|
| Revenue | | | | | | |
| Medicaid FPP portion to CPR | \$1,597,453 | \$2,080,498 | \$2,655,291 | \$3,264,215 | \$4,996,982 | \$5,755,677 |
| Medicaid \$3.25 money | \$199,524 | \$230,435 | \$247,078 | | | |
| Medicaid Care Coordination | \$117,948 | \$163,954 | | | | |
| Medicare FPP portion to CPR | \$929,563 | \$1,444,631 | \$1,381,738 | \$1,722,557 | \$1,628,210 | \$1,482,736 |
| BCBSVT QHP FPP Portion to | | | | ¢522.024 | ¢622.210 | |
| CPR | | | | \$532,824 | \$632,319 | |
| BCBSVT QHP \$3.25 PHMP | \$86,678 | \$94,042 | \$78,952 | | | |
| Hospital Investments | \$1,520,924 | \$1,407,167 | \$1,620,016 | \$1,684,305 | \$2,570,792 | \$4,202,057 |
| Other | | | | | | |
| TOTAL REVENUE | \$4,452,090 | \$5,420,727 | \$5,983,075 | \$7,203,900 | \$9,828,303 | \$11,440,469 |
| Expenses | | | | | | |
| Total CPR payments | \$4,452,090 | \$5,420,727 | \$5,983,075 | \$7,203,900 | \$9,828,303 | \$11,440,469 |
| Other | | | | | | |
| TOTAL EXPENSES | \$4,452,090 | \$5,420,727 | \$5,983,075 | \$7,203,900 | \$9,828,303 | \$11,440,469 |

^{*\$3.25} PMPM payments are paid to CPR practices outside the CPR framework.

In 2022, OneCare aligned funding more closely with how CPR program payments are made. Since the CPR PMPMs by practice and the mid-year attribution are known at the start of the program year, OneCare forecasts the total CPR program cost for the year (with the only real unknown being the reconciled non-core spend, see 2022 section, below).

OneCare has also become more deliberate about funding the adult and pediatric core code payments (excluding the \$5 CPR PMPM add-on payment), and the adult and pediatric non-core shadow spend (fee-for-service only, not the 5% add-on), directly from the FPP. Essentially, we are trying to fund the health care costs of the CPR program from the fixed payments, and the \$5 PMPM and the 5% non-core add-on bonus from the OneCare budget (not from the FPP). This creates a true connection between the CPR payment model and FPP funding.

2018 Final Summary Data

During the 2018 pilot year, three primary care organizations, representing six practices agreed to participate and work collaboratively with OneCare on the program design. In this initial program year, the CPR program included FFS-replacement funds, the \$3.25 PMPM population health management payment, care coordination funding, and a supplemental payment to support providers in their transition to this new model. The organizations were able to build the necessary infrastructure to make the conversion from FFS and realize the value of the predictable revenue stream and positive impact to the delivery of care. As a requirement of the program, CPR practices implemented a quality or service delivery improvement project, which was reported to OneCare and the other participants in the program.

| | | | | ed Lives (Star | t of PY) |
|-------------|--|---|----------|----------------|---------------|
| HSA | Organization | Practice Sites | Medicare | Medicaid | BCBSVT QHP |
| St Albans | Cold Hollow Family Practice, P.C. | Cold Hollow Family Practice, P.C. | 6 | 321 | 167 |
| Brattleboro | Primary Care Health Partners - Vermont LLP | Brattleboro Primary Care | 207 | 1,601 | 318 |
| Bennington | Primary Care Health Partners - Vermont LLP | Mt. Anthony Primary Care | 652 | 374 | 140 |
| St Albans | Primary Care Health Partners - Vermont LLP | St. Albans Primary Care | 946 | 534 | 398 |
| Burlington | Primary Care Health Partners - Vermont LLP | Timber Lane Pediatrics | 11 | 1,831 | 439 |
| Burlington | Thomas Chittenden Health Center, PLC | Thomas Chittenden Health Center, PLC | 1,995 | 780 | 979 |

| 2018 | Full Capitation | Partial Capitation | Hospital Primary Care |
|-------------------|-----------------|--------------------|-----------------------|
| | PMPMs | PMPMs | PMPMs |
| CPR Model | \$40.12 | n/a | n/a |
| Standard Model | \$31.20 | n/a | \$32.16 |
| Non-OneCare Model | \$25.93 | n/a | \$26.89 |

2019 Final Summary Data

For the 2019 Performance Year, participation increased to nine organizations spanning twelve practices. While the financial model was relatively unchanged, a partial capitation CPR model was offered to smaller practices as an on-ramp for transition into the full capitation CPR model. Under this model partial capitation participants continued to receive FFS but accepted the enhanced CPR funding and were held to similar expectations. From the clinical side, all CPR organizations participated in service delivery or quality improvement projects and provided reports of their outcomes.

| | | | Attribut | ed Lives (Sta | rt of PY) | |
|-------------|---|---|--------------|---------------|-------------|--------------|
| HSA | Organization | Practice Sites | Medicar e | Medicaid | BCBS QHP | CPR Model |
| Bennington | Avery Wood MD LLC | Avery Wood, MD | 185 | 142 | 63 | Partial |
| Burlington | Christopher J. Hebert, PC | Christopher Hebert, MD | 522 | 31 | 98 | Partial |
| St Albans | Cold Hollow Family Practice, P.C. | Cold Hollow Family Practice, P.C. | 483 | 401 | 138 | Full |
| Bennington | Eric S. Seyferth, MD | Eric S. Seyferth, MD | 379 | 7 | 73 | Partial |
| Burlington | Gene Moore MD, PLLC | Gene Moore MD, PLLC | 307 | 48 | 73 | Partial |
| Burlington | Green Mountain Internal Medicine PLC | Green Mountain Internal Medicine | 132 | 13 | 50 | Partial |
| Brattleboro | Primary Care Health Partners - Vermont LLP | Brattleboro Primary Care (and Adult) | 317 | 1,552 | 284 | Full |
| Bennington | Primary Care Health Partners - Vermont LLP | Mt Anthony Primary Care | 654 | 472 | 92 | Full |
| St Albans | Primary Care Health Partners - Vermont LLP | St. Albans Primary Care | 972 | 767 | 278 | Full |
| Burlington | Primary Care Health Partners - Vermont LLP | Timber Lane Pediatrics (and Milton) | 6 | 1,916 | 368 | Full |
| Burlington | Richmond Family Medicine PLLC | Richmond Family Medicine, PLLC | 700 | 262 | 355 | Full |
| Burlington | Thomas Chittenden Health Center, PLC | Thomas Chittenden Health Center, PLC | 1,988 | 832 | 739 | Full |

| 2019 | Full Capitation | Partial Capitation | Hospital Primary Care |
|-------------------|-----------------|--------------------|-----------------------|
| | PMPMs | PMPMs | PMPMs |
| CPR Model | \$41.27 | \$30.32 | n/a |
| Standard Model | \$34.70 | \$25.42 | \$24.74 |
| Non-OneCare Model | \$29.37 | \$20.52 | \$19.39 |

2020 Financial Summary Data

For 2020, seven organizations joined the full capitation model (two new practices and five who previously participated in 2019). The 2020 payment model was designed to incorporate a variable component for care coordination engagement and specific quality measures. However, due to the impacts of COVID-19, implementation of the variable component for care coordination engagement was delayed until July and the variable quality component was paused entirely. In general, these changes were intended to align with the broader changes OneCare implemented with its network to manage through the pandemic. Quality improvement continued to be a component of the program and required practices to attest to their project outcomes.

| 2020 | | | Attribute | ed Lives (Star | t of PY) |
|-------------|--|---|-----------|----------------|---------------|
| HSA | Organization | Practice Sites | Medicare | Medicaid | BCBSVT QHP |
| Bennington | Avery Wood MD LLC | Avery Wood, MD | 196 | 127 | 57 |
| Bennington | Eric S. Seyferth, MD | Eric S. Seyferth, MD | 396 | 6 | 78 |
| Burlington | Lakeside Pediatrics, PLLC | Lakeside Pediatrics, PLLC | 0 | 667 | 174 |
| Brattleboro | Primary Care Health Partners - Vermont LLP | Brattleboro Primary Care (and Adult) | 330 | 1,499 | 263 |
| Bennington | Primary Care Health Partners - Vermont LLP | Mt. Anthony Primary Care | 710 | 427 | 80 |
| St Albans | Primary Care Health Partners - Vermont LLP | St. Albans Primary Care | 974 | 746 | 248 |
| Burlington | Primary Care Health Partners - Vermont LLP | Timber Lane Pediatrics (and Milton) | 4 | 1,988 | 325 |
| Burlington | Richmond Family Medicine PLLC | Richmond Family Medicine, PLLC | 724 | 275 | 315 |
| Burlington | Thomas Chittenden Health Center, PLC | Thomas Chittenden Health Center, PLC | 2,078 | 685 | 616 |
| Burlington | University of Vermont Nursing and Health Sciences Practice Group, Inc. | Appletree Bay Primary Care | 471 | 97 | 121 |

| 2020 | Full Capitation | Partial Capitation | Hospital Primary Care |
|-------------------|-----------------|--------------------|-----------------------|
| | PMPMs | PMPMs | PMPMs |
| CPR Model | \$43.33 | n/a | n/a |
| Standard Model | \$32.83 | n/a | \$23.18 |
| Non-OneCare Model | \$27.47 | n/a | \$17.82 |

2021 Financial Summary Data

Due to the lingering impacts of the pandemic and as a means to simplify operations of the program, the financial model was adjusted in 2021. Specifically, the \$3.25 PMPM population health management payments and the care coordination payments were moved outside the CPR model. The variable PMPM component utilized in 2020, which was designed to align expectations for CPR and non-CPR practices, was difficult for practices to track and for OneCare to administer. This change simplifies the CPR payments, which now only include the FFS- replacement funds and the supplemental CPR payment. 2021 is also the first year in which OneCare was able to include a BCSBVT fixed payment component to the model, thus expanding the scope of this program within any given practice. Additionally, 2021 is the first year of practice-specific quality evaluation that will dictate payments from the Value Based Incentive Fund. With this evolution, the CPR practices are held to the same quality standards as the rest of the OneCare primary care practices.

| 2021 | | | Attribute | d Lives (Start | of PY) |
|-------------|---|-----------------------------------|-----------|----------------|-------------|
| HSA | Organization | Practice Sites | Medicare | Medicaid | BCBS QHP |
| Bennington | Avery Wood MD LLC | Avery Wood, MD | 188 | 120 | 48 |
| St Albans | Cold Hollow Family Practice, P.C. | Cold Hollow Family Practice, P.C. | 347 | 316 | 78 |
| Bennington | Eric S. Seyferth, MD | Eric S. Seyferth, MD | 395 | 6 | 61 |
| Burlington | Essex Pediatrics, PC | Essex Pediatrics | 0 | 1,810 | 234 |
| Bennington | Green Mountain Pediatrics, PC | Green Mountain Pediatrics | 0 | 274 | 46 |
| Burlington | Lakeside Pediatrics, PLLC | Lakeside Pediatrics, PLLC | 0 | 713 | 150 |
| Burlington | Pediatric Medicine PLC | Pediatric Medicine, PLC | 0 | 869 | 308 |
| Brattleboro | Primary Care Health Partners - Vermont LLP | Brattleboro Primary Care | 320 | 2,019 | 227 |
| Bennington | Primary Care Health Partners - Vermont LLP | Mt Anthony Primary Care | 650 | 380 | 69 |
| St Albans | Primary Care Health Partners - Vermont LLP | St. Albans Primary Care | 968 | 833 | 216 |

| | Primary Care Health | | 5 | 2,214 | 311 |
|------------|-----------------------------|------------------------|-------|-------|-----|
| Burlington | Partners - Vermont LLP | Timber Lane Pediatrics | , | 2,214 | 311 |
| | Richmond Family Medicine | Richmond Family | 778 | 337 | 300 |
| Burlington | PLLC | Medicine, PLLC | 778 | 557 | 300 |
| | Thomas Chittenden Health | Thomas Chittenden | 2 112 | 808 | 528 |
| Burlington | Center, PLC | Health Center, PLC | 2,112 | 808 | 528 |
| | University of Vermont | | | | |
| | Nursing and Health Sciences | | 348 | 98 | 90 |
| Burlington | Practice Group, Inc. | Appletree Primary Care | | | |

| 2021 | Full Capitation | Partial Capitation | Hospital Primary Care |
|-------------------|-----------------|--------------------|-----------------------|
| | PMPMs | PMPMs | PMPMs |
| CPR Model | \$32.39 | n/a | n/a |
| Standard Model | \$25.19 | n/a | \$25.46 |
| Non-OneCare Model | \$25.19 | n/a | \$25.46 |

2022 Financial Summary Data

For 2022, in addition to adding two primary care practices to the program, there were two noteworthy changes to the CPR model.

The first was a change in the cash flow for funding CPR payments, described in detail in the Source of Funds Section, above. In summary, OneCare realigned the funding of CPR payments to better align with how fixed payments are funded and how those funds should be distributed.

The second involved a change to how OneCare reimburses CPR practices for non-core services. Beginning in 2022, non-core payment was and is made prospectively as a PMPM payment targeted to achieve 105% of fee-for-service. OneCare retrospectively reviews CPR non-core payments after the performance year and claims runout to ensure the prospective PMPM payment is equal to the target of 105% of fee-for-service. OneCare adjusts the non-core PMPMs during the year when necessary to ensure accuracy of the prospective payment and to minimize year-end reconciliation. By reimbursing non-core services in this manner, it allows the payment to flex up with increased non-core service volume during the performance year. This allows practices to add non-core service capacity and see the increased capacity (volume) recognized in the increase to the prospective payment for non-core services, presumably during the second half of the year.

2022 Attributed Lives by HSA and Practice Site

| 2022 | | | Attributed Lives (Start of PY) | | |
|-------------|--|--------------------------------------|--------------------------------|----------|-------------|
| HSA | Organization | Practice Sites | Medicare | Medicaid | BCBS QHP |
| Bennington | Avery Wood MD LLC | Avery Wood, MD | 169 | 119 | 44 |
| St Albans | Cold Hollow Family Practice, P.C. | Cold Hollow Family Practice, P.C. | 360 | 327 | 80 |
| Bennington | Eric S. Seyferth, MD | Eric S. Seyferth, MD | 373 | 6 | 59 |
| Burlington | Essex Pediatrics, PC | Essex Pediatrics | 1 | 1,876 | 231 |
| Bennington | Green Mountain Pediatrics, PC | Green Mountain Pediatrics | 0 | 289 | 45 |
| Burlington | Lakeside Pediatrics, PLLC | Lakeside Pediatrics, PLLC | 0 | 723 | 172 |
| Burlington | Mountain View Natural Medicine | Mountain View Natural Medicine | 0 | 442 | 215 |
| Burlington | Pediatric Medicine PLC | Pediatric Medicine, PLC | 0 | 904 | 263 |
| Brattleboro | Primary Care Health Partners - Vermont LLP | Brattleboro Primary Care | 324 | 2,152 | 221 |
| Bennington | Primary Care Health Partners - Vermont LLP | Mt Anthony Primary Care | 679 | 452 | 70 |
| St Albans | Primary Care Health Partners - Vermont LLP | St. Albans Primary Care | 950 | 929 | 201 |
| St Albans | Primary Care Health Partners - Vermont LLP | Monarch Maples Pediatrics | 2 | 3,997 | 4 |
| Burlington | Primary Care Health Partners - Vermont LLP | Timber Lane Pediatrics | 3 | 2,411 | 311 |
| Burlington | Richmond Family Medicine PLLC | Richmond Family Medicine, PLLC | 766 | 369 | 316 |
| Randolph | South Royalton Health Center PC | South Royalton Health Center PC | 0 | 507 | 47 |
| Burlington | Thomas Chittenden Health Center, PLC | Thomas Chittenden Health Center, PLC | 2,042 | 912 | 509 |
| Burlington | University of Vermont Nursing and Health Sciences Practice Group, Inc. | Appletree Primary Care | 317 | 114 | 104 |

Financial Model Comparison

| 2022 | Full Capitation | Partial Capitation | Hospital Primary Care |
|-------------------|-----------------|--------------------|-----------------------|
| | PMPMs | PMPMs | PMPMs |
| CPR Model | \$34.25 | n/a | n/a |
| Standard Model | \$25.29 | n/a | \$25.42 |
| Non-OneCare Model | \$25.29 | n/a | \$25.42 |

2023 Financial Summary Data

For 2023, there are two significant changes to the CPR model.

The first is the development and implementation of the mental health integration model. The model offers CPR participants the opportunity to earn increased payment by performing routine mental health screening, electronically capturing screening results and follow-up, and reporting on screening and follow-up rates. Participating practices can earn additional monthly payment for staffing a mental health provider in the primary care clinic. Though the model is voluntary, all CPR participants have elected to participate. OneCare is starting to work with the practices to accumulate base year screening rates for 2022 and year-to-date rates for 2023. The plan is to continue this critical work in 2024 and beyond.

The second involves a change to how OneCare expresses and calculates base CPR rates on the basis of a share of the Total Cost of Care (see above). While this might seem insignificant, it shifts two critical payment paradigms. First, CPR payments were always based on historical fee-for-service payments, and in that way, acted to carry forward volume-based behaviors of the past. Reimbursement based on a percentage of TCOC rewards providers equitably based on newly-negotiated targets each year. Secondly, as the TCOC is increased year-over-year, primary care providers experience the same trend increase as other provider types. Moreover, this approach allows for two potential avenues for increasing funding to primary care — via the trend increase year-over-year and by increasing the PCSR itself, or the share of the TCOC. This approach, coupled with the willingness of OneCare governance to aggressively increase the PCSR, is completely transforming primary care reimbursement rates for participating independent primary care providers.

| 2023 | | Attributed Lives (Start of PY) | | | |
|-------------|--|--|----------|----------|------------|
| HSA | Organization | Practice Sites | Medicare | Medicaid | MVP QHP |
| Bennington | Avery Wood MD LLC | Avery Wood, MD | 156 | 117 | 39 |
| St Albans | Cold Hollow Family Practice, P.C. | Cold Hollow Family Practice, P.C. | 353 | 460 | 43 |
| Bennington | Eric S. Seyferth, MD | Eric S. Seyferth, MD | 362 | 9 | 13 |
| Burlington | Essex Pediatrics, PC | Essex Pediatrics | 0 | 1,972 | 82 |
| Bennington | Green Mountain Pediatrics, PC | Green Mountain Pediatrics | 0 | 274 | 23 |
| Burlington | Lakeside Pediatrics, PLLC | Lakeside Pediatrics, PLLC | 0 | 761 | 51 |
| Burlington | Mountain View Natural Medicine | Mountain View Natural Medicine | 0 | 530 | 63 |
| Burlington | Pediatric Medicine PLC | Pediatric Medicine, PLC | 0 | 919 | 93 |
| Brattleboro | Primary Care Health Partners - Vermont LLP | Brattleboro Primary Care | 216 | 2,201 | 47 |
| Bennington | Primary Care Health Partners - Vermont LLP | Mt Anthony Primary Care | 485 | 521 | 78 |
| St Albans | Primary Care Health Partners - Vermont LLP | St. Albans Primary Care | 1,014 | 1,087 | 241 |
| St Albans | Primary Care Health Partners - Vermont LLP | Monarch Maples Pediatrics | 2 | 4,278 | 46 |
| Burlington | Primary Care Health Partners - Vermont LLP | Timber Lane Pediatrics | 3 | 2,536 | 101 |
| Burlington | Richmond Family Medicine PLLC | Richmond Family Medicine, PLLC | 688 | 432 | 109 |
| Randolph | South Royalton Health Center PC | South Royalton Health Center PC | 0 | 516 | 3 |
| Burlington | Thomas Chittenden Health Center, PLC | Thomas Chittenden Health Center, PLC | 1,927 | 1,044 | 154 |
| Burlington | University of Vermont Nursing and Health Sciences Practice Group, Inc. | Appletree Primary Care | 352 | 123 | 24 |
| Lebanon | White River Family Practice, PC | White River Family Practice | 1,169 | 461 | 86 |

PRELIMINARY Financial Model Comparison

| 2023* ** | Full Capitation | Partial Capitation | Hospital Primary Care |
|-------------------|-----------------|--------------------|-----------------------|
| | PMPMs | PMPMs | PMPMs |
| CPR Model | \$39.80 | n/a | n/a |
| Standard Model | \$27.52 | n/a | \$27.16 |
| Non-OneCare Model | \$27.52 | n/a | \$27.16 |

^{*} These figures reflect initial observations of program outcomes and are subject to change as the year unfolds.

Evaluation

OneCare monitors the financial outcomes of the program to ensure practices receive payment as intended under the program design. CPR payments are compared to FFS-equivalent as a means of expressing the program's financial benefit but the true benefit, as confirmed time and time again by the participants, is the security of the fixed payment.

OneCare has taken steps to provide program data and information in more real time as part of the exercise of monitoring program payment compliance and reconciling the non-core prospective PMPM.

Administering this program requires regular communication with participants. In the summer, OneCare meets with each CPR practice to review multi-year program results, spanning from the completed prior program year, to the current program year, to the rates being offered in the future program year. Those meetings are currently underway now for 2023.

Additionally, under the Finance Committee, OneCare has constructed a CPR Clinical Advisory Group consisting of a half dozen CPR participants. For 2024, membership on the CPR CAG is being offered to all CPR practices. The group leads critical program development discussions, such as the development of the mental health integration model, and offers invaluable insight on other program function and operations.

Now that participants have been engaged in the program for a number of years, it's appropriate to evaluate whether CPR practices have been able to generate positive health outcomes as a result of being allocated a stable stream of revenue. To that end, OneCare has engaged Cynosure to perform a programmatic study of CPR.

^{** 2023} includes MVP in Hospital Primary Care instead of BCBS.