

Attachment A: OneCare Responses to GMCB's Attachment A

In response to the GMCB's Outstanding Questions and Requests (**in bold**) in the February 28, 2023 memo, OneCare provides the following responses:

- 1. Meeting with Vendor to Clarify Report Methodology: GMCB requires a meeting with OneCare and its benchmarking contractor's analyst(s) to better understand the methodology used in OneCare's October 2022 version of the report and subsequent changes for the March 2023 submission. The meeting should include a GMCB Member, GMCB analysts, and GMCB technical advisors to make sure the functional needs of the report align with the technical specifications. Note that this has been a consistent GMCB request since the vendor was selected and approved in early 2022.**

OneCare and its vendor will meet privately with a GMCB Member and GMCB analysts in order to maintain confidentiality of proprietary information that could impact their competitive advantage in the marketplace. To facilitate this meeting, we ask that the vendor's third-party release form be completed and questions provided at least 14 days in advance of the meeting to allow the vendor adequate time to prepare and to ensure an effective meeting. OneCare will work with GMCB to schedule this meeting.

- 2. Vendor Selection: Market research performed at the time this recommendation was made to GMCB, as well as GMCB staff's understanding from discussions with OCV during the vendor selection process, was that there were 2-3 "reputable" products on the market for ACO performance benchmarking, meaning established products with a track record that meets industry standards. In the early spring of 2022, OneCare completed an evaluation of the two potential vendors with major reputable benchmarking products that were currently in the market which would meet the majority of the GMCB requirements. OneCare's chosen vendor offers an existing reputable ACO benchmarking product. Based on OneCare's assessment of the two credible products provided to GMCB with OCV's request to approve their chosen vendor, GMCB was under the impression that OneCare selected the "off-the-shelf" product produced by their chosen vendor; however, GMCB has become aware that the benchmarking report submitted in October 2022 is a customized report. The GMCB is interested in understanding why OCV's vendor recommended and created a customized report to satisfy the GMCB FY22 Budget Order Condition, rather than using their reputable off-the-shelf product.**

- How does the methodology in the custom report produced for OCV compare to the off-the-shelf product, for example, as it relates to identifying ACO benchmarks of "Loosely-Managed" (50th percentile) and "Well-Managed" (90th percentile) for each measure?**
- Did OneCare consider using the vendor's off-the-shelf product? Please explain the rationale for creating a customized report.**

As detailed in our revised budget submission of March 30, 2022, OneCare reviewed four vendors and narrowed the selection based on the vendor's ability to meet the GMCB's criteria in the 2022 Budget Order as well as provide value for network performance improvement. Throughout the vendor selection process, OneCare kept GMCB staff well-informed of key findings and shared various analyses to demonstrate why the selected vendor was chosen. OneCare discussed the possibility of using the vendor's off-the-shelf solution, however, the 50th and 90th percentile performance in the vendor's off-the-shelf product does not represent an ACO population, rather the entire fee-for-service (FFS)

Medicare population. To fairly measure OneCare's Medicare ACO performance as well as specifically identify areas of opportunity to further reduce costs, a customized empirical benchmark is necessary.

3. Future Reports: Attached is an analysis of OCV's October 2022 benchmarking report identifying areas where the report does not meet the requirements set out in GMCB's subsequent FY23 budget vote; this was previously provided to OCV staff. Please respond to the following questions:

- **How does OCV propose to meet the requirement that the report identify top performers in each metric?**

OneCare intends to use its report to identify areas of opportunity, and to work with its vendor to identify high performing organizations within its National ACO Peer Cohort that align with OneCare's priorities.

- **OCV has indicated that in the future, its vendor will produce two reports: one version for OCV's network utilizing the October 2022 report template and methodology, and a separate version for submission to the GMCB. As mentioned by Board Members in their public discussions of OCV's FY23 budget, this is contrary to the purpose of GMCB's FY22 Budget Order Condition, which required that the benchmarking report be used to support transformation within the OCV network through identification of best practices and ROI estimation. How can OCV's strategy of separate reports for its network and GMCB meet this requirement, given that the October 2022 report did not allow for identification of best practices by metric or ROI estimation?**

OneCare has provided the requested adjustments in the March 31, 2023 version of the benchmarking report for the GMCB's purposes. As stated, there are concerns about the validity of the revised comparisons. As such, we have maintained the October 2022 version for OneCare's own performance management and improvement.

For performance monitoring and improvement, OneCare seeks to identify ACOs with a similar business model so that any high performing indicators would translate into realistic best practices to share with our network. OneCare is not a clinically-integrated network and each of the 126 organizations we contract with have independent business controls. Thus, we rely on a voluntary and participatory network to set priorities, make changes, and hold each other accountable for delivering high quality, effective, and efficient care for the populations they serve. For example, a SNF-only or physician-only ACO has different foci and different levels of integrated controls over their organizations' best practices.

Further, by reviewing the 50th and 90th percentiles of the National Peer ACO Cohort, OneCare can assess the breadth of measures and interplay among them to identify clear areas of exceptional performance. For example, if ED visits are significantly lower, does this region have better primary care access and hence higher primary care visits? Applying systems thinking and acknowledging the complexity of the health care system will allow us to more specifically identify Peer ACO best practices and disseminate them among our network.