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TO: Green Mountain Care Board
RE: Comments on OneCare Vermont FY24 Budget and Certification Guidance
FROM: Julie Wasserman, MPH
DATE: June 27, 2023

Full support is extended to the GMCB for its diligent and detailed FY 2024 ACO Budget and Certification Guidance for OneCare Vermont. However, the Guidance does not go far enough in requiring accountability from the state's sole ACO, Vermont's chosen vehicle to implement the All Payer ACO Model.

We are in Year 7 of the All Payer Model and we still do not know the number of lives OneCare actually served in any given year.

People often mistake the counts in GMCB's "*Annual ACO Scale Targets and Alignment Report*" for the number of ACO lives served. However, this yearly report provides only "prospective" Starting Attribution counts which are estimates made in the fall *prior to* the upcoming year and are not especially empirical, even with subsequent adjustments. These prospective counts are often overly optimistic and do not take into account naturally occurring attrition throughout the year and other factors that *reduce* the number of ACO lives served by OneCare.

Medicare is the only payer for which data is publicly available on ACO lives served. According to CMS's Financial Settlement on Medicare Shared Savings/Losses, OneCare's "Aligned Beneficiaries Adjusted for Attrition" shows 583,377 Accrued Eligible Person-Months in 2021 – see slide 7, line 8 [here](#). This is the equivalent of roughly 48,615 people served. However, the GMCB's 2021 *Annual ACO Scale Targets and Alignment Report* shows 62,392 Medicare lives participating in the ACO – see page 6 [here](#). The difference between these two numbers is significant: almost 14,000 lives.

The FY24 Budget and Certification Guidance for OneCare needs to require that OneCare provide the following information:

The number of Aligned Beneficiaries Adjusted for Attrition served by Payer for each of the ACO years, accompanied by OneCare's Actual Total Budget for each of those years.

At a minimum, the GMCB and CMS should mandate the submission of this basic information (i.e. a running report on performance). Without this, how can we have an accurate picture of the number of people served and at what cost to Vermonters?