



To: Susan Barrett, Sarah Kinsler  
From: Vicki Loner  
CC: Sara Barry, Tom Borys, Amy Bodette, Joan Zipko  
Date: October 30, 2020  
Subject: Response to GMCB Regulatory Alignment White Paper, Part 2: Options for Regulatory Timeline and Logistics

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Dear Green Mountain Care Board:

We understand the GMCB aims to improve regulatory alignment and has constructed a whitepaper as a vehicle to outline options and solicit feedback due end of October, 2020. OneCare appreciates and supports the Board's process for wide stakeholder engagement to help shape and streamline future regulatory alignment.

Please accept this memo as OneCare's response to the GMCB Regulatory Alignment White Paper, Part 2: Options for Regulatory Timeline and Logistics.

**Recommendation 2: Consider Using Statewide Data for Medicare Benchmark to Reduce Data Availability Challenges**

While OneCare recognizes the pressures with the timing of the Medicare benchmark calculation, we do not support using the statewide Medicare population in order to accelerate the Medicare ACO benchmark decision. Although this option would provide a timelier benchmark calculation, the methodology would not accurately reflect the total cost of care or risk of the ACO-attributed Medicare population.

**Recommendation 3: Continue to Improve Communication of Hospital Budget Impacts on QHP Filings**

OneCare supports the GMCB's continued work to improve communication regarding the impacts of hospital budgets in rate review decisions and how the process overlaps with individual market health insurance premium rate review. In tandem, OneCare supports appropriate spacing between these events so that the outcome of the insurance rate review decisions can be properly incorporated into subsequent aspects of the regulatory cycle.

Thank you again for seeking input from OneCare as part of your stakeholder engagement efforts with this initiative.