From: LaJeunesse, Kristen<Kristen.Lajeunesse@vermont.gov>

Sent on: Tuesday, December 5, 2023 2:46:20 PM

To: GMCB - ACO<GMCB.ACO@vermont.gov>; GMCB - Board

Members<GMCB.BoardMembers@vermont.gov>; Bredice, Tara<Tara.Bredice@vermont.gov>

Subject: Public Comment: Accountable Care Organization (ACO) 2023-12-05T14:46:18Z

A new GMCB Public Comment has been received.

Submit Time: 12/5/2023 2:46:18 PM

Name: Ethan Parke

Affiliation:

Town/City: Montpelier

Topic: Accountable Care Organization

Comment: I am writing to urge the Green Mountain Care Board to reject the budget submission of Vytalize ACO and any other proposed ACO REACH entity in Vermont until the legislature has weighed in on for-profit Medicare only ACOs and Rule 5 has been revised to encompass them. The ACO REACH program threatens to dismantle traditional Medicare which has served Vermonters well since 1965. I understand that the GMCB has been advised that it has little regulatory jurisdiction over a federally sanctioned program using only federal funding, however this is a murky area of law, and it remains to be seen whether federal preemption would apply to a private entity that is not a federal contractor doing business in Vermont as an ACO, and in doing so, significantly affecting the health and well being of Vermonters. Of note is the fact that the only way for a Medicare patient to opt out of ACO REACH is to change primary care providers. This is not a viable option for many people and should be a consideration in the GMCB's oversight.

Post Comment: Yes