

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

**Sent on:** Tuesday, December 5, 2023 4:31:45 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) 2023-12-05T16:31:44Z

A new GMCB Public Comment has been received.

**Submit Time:** 12/5/2023 4:31:44 PM

**Name:** Howard Jennings

**Affiliation:** Individual recipient of care at MCH

**Town/City:** Bristol

**Topic:** Accountable Care Organization

**Comment:** Dear GMCB, Thank you for the opportunity to comment on the Vytalize proposal vis a vis Mountain Community Health in Bristol. I appreciate that you have many things on your plate and are trying to do as good a job as possible of facilitating good healthcare provision in Vermont. We love our Mountain Community Health Center, and we want the best for them. They do a wonderful job, and we do not want that to be diminished. Even so, I have a number of concerns about the Vytalize proposal. Much of this is about the process, and I hate to be critical but feel I must. Public comment is critical on such a fundamental thing as people's healthcare, but I am not aware of any publicity in the MCH service area about this proposal, nor are any of the many people I have talked to. Even MCH did not appear to provide any information. People are angry about this, as I am. I should think you want to have the public supportive of what you do, not be angry at you because you don't provide information. People want transparency, and when they don't get it, they are suspicious of the motives of all the organizations involved. As nearly as I can tell a person would need to be constantly monitoring the GMCB web site to see if there is anything of interest, which is an outrageous expectation to put on the public. I am sure you are only offering comment because it is legally required, and this lack of notice almost seems like flouting the law. YOU SHOULD PUT FUNDS AND RESOURCES IN YOUR BUDGET TO AMPLY NOTIFY EVERY COMMUNITY BEING AFFECTED BY YOUR NEW PROGRAMS AND BUDGET REQUESTS. AND NOT JUST A SINGLE NOTICE, BUT SOMETHING MORE WIDESPREAD, AND IF YOU CAN'T DO THAT YOU SHOULD MAKE IT A REQUIREMENT OF THE ENTITY BRINGING THE PROPOSAL – IN THIS CASE VYTALIZE - AND THE LOCAL HEALTH AGENCY INVOLVED, MCH. Second is the insultingly short time frame for comment. Local groups in the MCH area learned of the Vytalize proposal nearly two weeks after the GMCB review, giving us only a week to inform the public and suggest they comment. Frankly this is outrageous, and if it was so important that this budget be approved before 2024, then the proposers should have been required to submit much earlier. A third point the GMCB should realize is that citizens are very concerned about the seemingly inexorable privatization of healthcare. They hate it because they see the profits of companies being prioritized over people's need for care. We see Medicare Advantage luring people in through low premiums and making them more vulnerable to denial of care than in traditional Medicare. With MA now having half of Medicare, thus leaving traditional Medicare with a shrinking risk pool of participants, we are concerned that the stability of the whole Medicare program is in jeopardy. We understand this is not MA, but we see the ACO program as a next step to go after privatizing the rest of traditional Medicare. As to details of the Vytalize proposal, there are not many available. Medical professional who have long studied the money flows and care delivered in the healthcare system in general and Medicare in particular are concerned that the program puts the best care at risk and will draw more money from Medicare through upcoding and other practices. When a firm such as Vytalize can attract \$150 million in venture capital in only a few years, it clearly is a lucrative field to be in, and we citizens wonder where that money will come from to meet their business model and profits. The only things we can imagine are siphoning more money from Medicare which we pay for, and lowering costs of care provided, and we are very skeptical of Vytalize's ability to achieve that much savings through efficiency

alone. Especially since the first 25% of saving go to Vytalize. We are not naïve, and we realize these formulas are the workings of the private sector to go after Medicare. We also worry that there may not be enough financial benefit to MCH. MCH's continued prosperity is paramount.

**Post Comment:** Yes