

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

**Sent on:** Friday, December 1, 2023 1:07:10 AM

**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) 2023-12-01T01:07:09Z

A new GMCB Public Comment has been received.

**Submit Time:** 12/1/2023 1:07:09 AM

**Name:** Mark Gibson

**Affiliation:** patient Mountain Community Health

**Town/City:** Bristol VT

**Topic:** Accountable Care Organization

**Comment:** Vitalize does upcoding to increase the money it takes out of Medicare. That is they use the application CareJourney to find codes for patients that are related to their existing code but are a little sicker and thus enable Vitalize to take more money out of Medicare. A federal government investigation uncovered this about ACO reach and Advantadge, but when they went to pass a law making upcoding illegal, this was fought so vigorously by the companies profiting that the law was watered down to nothing. Is GMP aware of this practice? Is MCH? Can GMP monitor this? Can they stop the practice? Do we need a law in Vermont outlawing upcoding to stop this practice? Is there anyone who actually thinks this practice is ok (aside from those profiting from it)? It has the effect of increasing the cost of Medicare patients by \$300-\$600 annually. Given that the point of "value based" care is to reduce costs to Medicare doesnt this seem like a failure in this regard? Is GMP actually in a position to prevent the introduction of Vitalize to Vermont? Im unclear what are the potential outcomes of this review period are. ACO reach firms set up incentivizes to deny care - and the denials flow - way too much - Advantadge suffers from this as well. Saving money by over denying care is not a good way to save money. Its being said that this is all misinformation. But I dont hear anyone addressing these specific issues. This is all very concerning.

**Post Comment:** Yes