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Name

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Affiliation, if applicable

Clover Health Partners

Town/City

Jersey City

Topic

Accountable Care Organization

Comment

October 19, 2021

Green Mountain Care Board
144 State Street
Montpelier Vermont 05602

Re: 2022 Budget Guidance and Reporting Requirements for Medicare-Only Non-Certified Accountable Care Organizations

Dear Chairman Mullin,

Clover Health thanks the Green Mountain Care Board (the Board) and its staff for the time and consideration you all have dedicated to preparing the proposed 2022 Budget Guidance and Reporting Requirements for Medicare-Only Non-Certified Accountable Care Organizations (the Proposed Guidance).

During the Board meeting on October 13, 2021, when Board staff introduced the Proposed Guidance to the Board, Clover Health noted a few concerns and suggestions aimed at ensuring that the requirements appropriately balance the Board's statutory obligations with the resulting burden placed on Accountable Care Organizations (ACOs). Most significantly, we proposed that very small Medicare-only ACOs (ACOs with fewer than 2,500 lives or 30 Participant Providers) should be exempt from the reporting requirements.

While the Board has been fair and reasonable in its approach to addressing the reporting and oversight requirements of Medicare-Only Non-Certified ACOs with fewer than 10,000 beneficiaries, we believe these requirements, as currently proposed, remain overly burdensome for ACOs with a very small footprint in Vermont. Clover Health fears that, in an effort to protect Vermonters, the requirements will inadvertently prevent ACO's from implementing healthcare innovation that could ultimately benefit all Vermonters. This fear is not specific to Clover Health's Vermont presence but to all healthcare entities that may perceive Vermont as a difficult place to conduct healthcare business.

Again, Clover Health recognizes the balancing act required to protect Vermonters while providing meaningful health care innovation in the State and asks that you strongly consider limiting the

applicability of the reporting requirements to ACOs with a very small presence in Vermont. Doing so would ensure that Vermonters have access to the highest value health care as our country transitions away from volume-based fee-for-service care.

We appreciate your commitment to value-based care and are committed to being a valued member of the Vermont healthcare community.

Kevin Murphy
Clover Health Partners
DCE Executive Director