
DELIVERED ELECTRONICALLY

May 27, 2020

Fatema Salam
Vermont All-Payer ACO Model Lead
Center for Medicare and Medicaid Innovation
Centers for Medicare and Medicaid Services
Fatema.Salam1@cms.hhs.gov

Dear Ms. Salam,

First, we would like to thank you, and your team at CMMI, for the careful consideration of requests made in regards to the FY 2019 and FY 2020 performance years of Vermont's All Payer ACO model, and the Medicare ACO Initiative and look forward to receiving your response. As you know, Vermont is committed to health care reform and the path that we have set in motion together, especially as it pertains to our state's movement away of from fee-for-service reimbursement, to population and value-based care.

Despite widespread commitment to this model, many of our Vermont providers continue to face uncertainties around COVID-19 and their financial futures, and have expressed their inability to accommodate the 5% risk corridor set forth in the Medicare ACO Initiative at this time. As such, we fear that maintaining this level of risk during this uncertain time will significantly challenge our ability to work toward the scale targets set forth under the All Payer Model agreement. It is in recognition of these challenges and aspirations that we are requesting a reduction in the risk corridor for the 2021 program year.

We thank you for considering this adjustment to the Vermont Medicare ACO Initiative for the 2021 program year and look forward to your continued partnership as we weather this uncertain time together.

Sincerely,



Susan Barrett
Executive Director
Green Mountain Care Board

cc: Pierre Yong, Acting Division Director
Rivka Friedman, Director State Innovations Group, Acting Director Prevention and Population Health Group

