

Green Mountain Care Board
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DELIVERED ELECTRONICALLY

March 21, 2017

Craig W. Jasenski, Director
MVP Healthcare
62 Merchant's Row
Williston, Vermont 05495

Re: MVP Response to the Green Mountain Care Board's February 1, 2017 Request for Insurers to Resubmit Plans Pursuant to Act 143 of 2016

Dear Mr. Jasenski:

As you are aware, the Board issued a report on February 1, 2017, in accordance with Section 4 of Act 143 of 2016, addressing "the advisability and feasibility of expanding to commercial health insurers the prohibition on any increased reimbursement rates or provider-based billing for health care providers newly transferred to or acquired by a hospital" (the Report). In the Report, the Board issued recommendations that require MVP and Blue Cross and Blue Shield of Vermont to revise and resubmit their previously-submitted implementation plans no later than March 15, 2017. The resubmitted plans should address how the insurer plans to align its fee schedules to reflect MedPAC recommendations on site-neutral payments, and identify the effects of the alignment on 2018 plan designs, rates and implementation of the All-Payer Model.

MVP did not provide a revised plan, analysis or a proposed effective date of implementing the reimbursement practices outlined in the Report. Instead, MVP sent the Board a one-page letter that lacks any specific actions that MVP will take, within a specified timeframe, to implement the Report's recommendations. MVP's vague assurance that it will "initiate a thorough review of the Report's recommendations" at some unknown time in the future fails to meet the Board's directive, and is contrary to the goal of achieving fair and equitable payments across providers.

Accordingly, the Board requests that MVP provide, no later than March 31, 2017, a revised submission that specifically addresses and responds to the recommendations outlined in the Report.



If you have any questions, please do not hesitate to contact me at 802-828-2177.

Sincerely,

s/ Judy Henkin

Judy Henkin

General Counsel, Green Mountain Care Board

cc: Susan Gretkowski, MVP

