

Date: March 16, 2017 at 10:30:26 PM EDT

To: wlippert@leg.state.vt.us

Subject: ACO legislation

Mr. Chairman,

I am forwarding this to you from Todd Moore, who has reviewed the ACO bill.

Many thanks,

Kevin Ellis

Mr. Chairman — I am submitting these thoughts on your committee bill so that you can move ahead tomorrow as you have expressed to Kevin.

Of course, my preference would be to examine it for a few more days and come discuss some of the issues raised with the committee.

But given your time crunch, I support the bill with some small reservations that I describe below. None of these issues are ones that we cannot work out together with DVHA and the legislature over the course of the next year.

Suggestions/Questions:

Section 1.a.2 – Does this include amounts also expended by DVHA for providers remaining fee for service (under ACO risk) for the attributed population?

Section 1.a.4.A and 1.a.4.B – Does the committee know how it will assess the results, and want to indicate a need for “best explanations” of the measured differences? My biggest hope is that the bill include a requirement in Section 1.a.4.A and 1.a.4.B to require some analytic interpretation from DVHA.

Section 1.a.5 – Does this apply to complaints, grievances, and appeals to DVHA or the ACO? Or both? And I assume you only want information on those applicable to the VMNG “pilot” for the first part of the paragraph.

Lastly, it would be great if you could include an opportunity for the ACO to offer written comments or testimony from our perspective on the quality and expenditure quarterly reports.

Thank you for your work and please feel free to contact me with any questions.

Best wishes,

Todd Moore

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