

Request for Information—DVHA

1. A searchable copy of contract #32318
Please see attached searchable contract.

2. A breakdown of attributed members in each MEG

| MEG (as of 01/01/17) | Number (%) of Attributed Members |
|--|---|
| Aged, Blind, or Disabled (ABD) Adult & Child | 1,910 (6.56%) |
| Consolidated Adult | 12,988 (44.63%) |
| Consolidated Child | 14,205 (48.81%) |
| Total | 29,103 |

3. The trend factors applied to each MEG for calculation of the ETCOC and any explanatory documents
Please see attached actuarial report (p. 17, *D. Trends*, and p. 36, *Appendix B.3 – Capitation Rate Development (Final AIPBP)*) for detail on the trend factors applied and a description of the approach used to derive the trend factors.

4. The total number of OneCare providers and how many of those are primary care providers

| Participating Provider Specialty (as of 01/01/17) | Number (%) of Providers |
|--|--------------------------------|
| Primary Care | 678 (36.93%) |
| Specialist eligible for Attribution | 128 (6.97%) |
| Specialist not eligible for Attribution | 1,030 (56.10 %) |
| Total | 1,836 |

5. The total number of attributed Medicaid members and how many of those are attributed to primary care providers

| Attributing Provider Specialty (as of 01/01/17) | Number (%) of Attributed Members |
|--|---|
| Primary Care | 28,580 (98.20%) |
| Specialist | 523 (1.80%) |
| Total | 29,103 |

6. A copy of OCVT’s network contracts (where contracts are duplicative, one copy will suffice, and attachments with standard language are unnecessary)

Please see attached OneCare Provider Base Agreement and Medicaid Addendum.

7. A copy of the Readiness Review report cited in Attachment B, Sec D.4

Please see attached Readiness Review Report.

8. Sec. 1.2.1 of the SOW states that “the AYs used for the PY are the time periods representing State Fiscal Years 2014 and 2015”; however, the table just below that statement shows the corresponding AYs to be FY 15 & 16. Which is correct?
The table is correct; the sentence excerpted above should read “State Fiscal Years 2015 and 2016.”
- a. If FY2014-15 data were used, please explain why more recent data were not chosen for attribution, especially given the distortions due to delayed redeterminations.
Data from SFY 2015-16 were used.
 - b. Did DVHA’s actuary estimate the total cost of care if the attributed population was based on FY2016? If so, please provide.
The TCOC estimates were based on CY 2015 (the most recent full calendar year of data) and were trended forward to 2017. Please see attached actuarial report for additional detail.
9. Sec. 10 appears to provide a process for monthly adjustment of PMPM payments based on current Medicaid status. Is this correct and does the adjustment include all three components of the net AIPBP monthly payment? Does the Medicaid ACO PMPM File contain only active members?
Yes, PMPM payments are adjusted monthly based on Medicaid eligibility for the prospectively attributed Medicaid members. This applies to all three components of the net AIPBP monthly payment—if a member is ineligible for attribution during a given month, no prospective payments will be made on behalf of that member. The Medicaid ACO PMPM file contains the full list of members each month, but indicates when no payment has been made for a member (because of Medicaid ineligibility, evidence of other insurance coverage, or death) for that month.
10. Sec. 10.2.2 states that DVHA’s fiscal agent will continue to receive all claims from VT Medicaid providers and that all claims will continue to be processed through DVHA’s edits and audits. However, 10.4.6 refers to a ACO non-claims response file containing payments to providers not reported at a claim level. Please explain.
Providers are required to submit claims as they have previously, and DVHA’s fiscal agent will continue to process those as they have previously. However, claims for providers electing to receive a prospective payment from the ACO will be zero-paid by DVHA’s fiscal agent upon processing. Through the ‘ACO Non-Claims Response File’, the ACO will detail payments that it makes to any providers being paid prospectively. It is expected that the ACO will make monthly fixed prospective payments to providers regardless of how many claims they submit.

11. Will the year-end reconciliation process to compute the actual cost of care utilize data from FFS claims, zero-based claims and WHPP claims amount or will the calculation be a sum of FFS payments and monthly (adjusted and reconciled) net AIPBP payments?
The Actual Total Cost of Care will be calculated using the sum of FFS payments on behalf of attributed members and the sum of adjusted and reconciled fixed prospective payments (the net AIPBP minus admin and PCCM fee).
12. If the latter, will DHVA perform an analysis of actual cost of care for attributed population based only on claims data (actual and estimated)?
DVHA intends to utilize the WHPP amounts captured for the zero-paid claims in order to understand what would have been spent on services for attributed members absent the prospective payment to the ACO. The total WHPP amount will be compared to the total amount prospectively paid during the year. The WHPP amounts will also be considered in setting ACO rates in future years (i.e. trending forward CY 2017 expenditure to set rates for CY 2019).
13. Sec. 7.0 of the contract (attachment A), states that VCCI will no longer be engaged in care management for the ACO-attributed Medicaid population. Please provide the number of Medicaid members that were receiving care management from VCCI and now have care management assigned to OneCare.
63 Medicaid members who were being case-managed by VCCI at the start of the contract period are now in the process of being transitioned to OneCare for management going forward. The VCCI and OneCare teams have been coordinating to ensure an individualized approach and a 'warm hand-off' for each member. It is expected that this process will be ongoing for the next several weeks.
14. Explain if or how Blueprint activities and Patient-Centered Medical Homes (PCMH) are integrated into this contractual arrangement:
The Blueprint and PCMH activities are not integrated in the contract. The ACO and Blueprint collaborate presently, as they have during the multi-payer shared savings programs during the past several years. Until the ACO has more people enrolled, the Blueprint will likely continue to serve state government to facilitate and encourage practice transformation across the whole population rather than solely the ACO program attributed lives. This is consistent with Blueprint's traditional role focusing on multi-payer health care reform.
 - a. For instance, will OneCare's network of primary care providers continue working on Blueprint initiatives? If so, is the cost of this work included in the amount of the contract?
Yes, we anticipate OneCare's network will continue to work on Blueprint initiatives. The ACO contract does not contain terms that would definitively

change the relationship between providers and the Blueprint. Furthermore, the cost of Blueprint related activities is not included in the contract amount.

- b. Do cost savings from those activities and support networks accrue to OneCare, and will they no longer be considered in Blueprint's ROI?

DVHA's goal is to understand savings and ROI related to the ACO and Blueprint separately to judge each program on its actual performance.

- c. Will OneCare's primary care providers receive the PCCM payment that is part of the net AIPBP?

Yes, OneCare primary care providers will continue to receive the PCCM payment. This is a pass-through payment that does not affect the calculation of the AIPBP.

- 15. The sections in Attachment B related to payment for services (D) and distribution of the AIPBP (E) break the DVHA payments into two parts: (1) a monthly "net AIPBP" payment to OCVT that includes covered services billed by ACO-contracted providers, which in total accounts for 64% of the expected total cost of care for the attributed members; and (2) fee-for-service payments paid directly to providers for claims submitted to DVHA, estimated at 36% of the expected total cost of care.

- a. Please confirm that the maximum amount of the contract includes both the net AIPBP payments made directly to OneCare and the FFS payments made by DVHA directly to providers (both affiliated and non-affiliated) for attributed members.

Yes, the maximum contract amount includes both the Net AIPBP payments to OneCare and the FFS payments made by DVHA for attributed members. The maximum contract amount was calculated by assuming all attributed members would have the weighted average Total Cap payment made on their behalf for each of the months of the year:

$\$267.32 \text{ PMPM} * 29,103 \text{ members} * 12 \text{ months} = \$93,357,767.52$

- b. How are the prospective payments to OneCare distributed to providers, and does DVHA have authority to review these distributions?

Please see attached 'Exhibit 1' documents (accompanying the OneCare Provider Base Agreement and Medicaid Addendum) for each of the 4 hospitals that will be receiving prospective payments from OneCare. These describe the mechanism by which prospective payments will be made per each hospital's contract with OneCare. DVHA has the authority to audit actual payments throughout the program year.

- c. If DVHA has the authority to review OneCare's distributions to providers, please describe how DVHA has executed, or plans to execute, this authority.

DVHA plans to exercise its authority to review OneCare's distributions to providers; the approach for doing so is under development.

16. Did OneCare provide primary care physicians with the option of participating in the capitation payment rather than FFS payment? (This was a recommendation of the ACO Payment Subcommittee, convened by GMCB in 2015 and on which OneCare was represented).

OneCare provided the prospective payment option at the organizational (or Tax Identification Number) level, but not at the individual provider level. In the 2017 program year, the four participating hospitals (and any hospital-owned practices under their TINs) elected to be paid prospectively; other participating practices (including independent practices and FQHCs) elected to continue being reimbursed FFS.

17. Under Sec. 10.7, OneCare must “participate in data sharing agreements with any health information technology entity required by DVHA.” The contract does not specify the VHIE, so please provide any documents that explain the current and prospective HIT arrangement.

DVHA has not exercised its authority under this section of the contract. DVHA is generally aware that the ACO has a contractual relationship with VITL, which manages the VHIE.

18. In the presentation given to House Health Care Committee on Wednesday (2/15), DVHA’s share of expenditures over/under 3% of TCOC is shown as zero. However, the contract states that if actual TCOC is between 97% and 100% of expected total TCOC, “OneCare will be entitled to receive from DVHA all savings associated with [those] costs” (p. 83). Please explain.

Slide seven of the presentation to the House Health Care Committee attempts to provide policymakers a simple visual illustration of how a 3% upside/downside risk corridor works. The graphic means to convey that between 97% and 103% of expected total cost of care OneCare is at risk to either earn savings or pay for excess spending. DVHA is not at risk for these payments between 97% and 100%; rather, it is fully obligated to pay for these payments.

The graphic was designed as a prompt for testimony and subsequent committee discussion. The accompanying testimony made the following contract terms clear:

- OneCare is entitled to receive from DVHA all savings between 97% and 100% of the total cost of care;
- OneCare is obligated to pay DVHA all costs between 100% and 103% of the total cost of care
- DVHA shall recoup from OneCare any savings where costs fell below 97% of the total cost of care
- DVHA is entitled to pay all costs in excess of 103% of the total cost of care.

The risk arrangement issue can be difficult to explain. DVHA would gladly discuss with your office ways to make the presentation and related concepts more clear.

Request for Information—DVHA

1. A searchable copy of contract #32318
Please see attached searchable contract.

2. A breakdown of attributed members in each MEG

| MEG (as of 01/01/17) | Number (%) of Attributed Members |
|--|---|
| Aged, Blind, or Disabled (ABD) Adult & Child | 1,910 (6.56%) |
| Consolidated Adult | 12,988 (44.63%) |
| Consolidated Child | 14,205 (48.81%) |
| Total | 29,103 |

3. The trend factors applied to each MEG for calculation of the ETCOC and any explanatory documents
Please see attached actuarial report (p. 17, *D. Trends*, and p. 36, *Appendix B.3 – Capitation Rate Development (Final AIPBP)*) for detail on the trend factors applied and a description of the approach used to derive the trend factors.

4. The total number of OneCare providers and how many of those are primary care providers

| Participating Provider Specialty (as of 01/01/17) | Number (%) of Providers |
|--|--------------------------------|
| Primary Care | 678 (36.93%) |
| Specialist eligible for Attribution | 128 (6.97%) |
| Specialist not eligible for Attribution | 1,030 (56.10 %) |
| Total | 1,836 |

5. The total number of attributed Medicaid members and how many of those are attributed to primary care providers

| Attributing Provider Specialty (as of 01/01/17) | Number (%) of Attributed Members |
|--|---|
| Primary Care | 28,580 (98.20%) |
| Specialist | 523 (1.80%) |
| Total | 29,103 |

6. A copy of OCVT’s network contracts (where contracts are duplicative, one copy will suffice, and attachments with standard language are unnecessary)

Please see attached [OneCare Provider Base Agreement and Medicaid Addendum](#).

7. A copy of the Readiness Review report cited in Attachment B, Sec D.4

Please see attached [Readiness Review Report](#).

8. Sec. 1.2.1 of the SOW states that “the AYs used for the PY are the time periods representing State Fiscal Years 2014 and 2015”; however, the table just below that statement shows the corresponding AYs to be FY 15 & 16. Which is correct?
The table is correct; the sentence excerpted above should read “State Fiscal Years 2015 and 2016.”
- a. If FY2014-15 data were used, please explain why more recent data were not chosen for attribution, especially given the distortions due to delayed redeterminations.
Data from SFY 2015-16 were used.
 - b. Did DVHA’s actuary estimate the total cost of care if the attributed population was based on FY2016? If so, please provide.
The TCOC estimates were based on CY 2015 (the most recent full calendar year of data) and were trended forward to 2017. Please see attached actuarial report for additional detail.
9. Sec. 10 appears to provide a process for monthly adjustment of PMPM payments based on current Medicaid status. Is this correct and does the adjustment include all three components of the net AIPBP monthly payment? Does the Medicaid ACO PMPM File contain only active members?
Yes, PMPM payments are adjusted monthly based on Medicaid eligibility for the prospectively attributed Medicaid members. This applies to all three components of the net AIPBP monthly payment—if a member is ineligible for attribution during a given month, no prospective payments will be made on behalf of that member. The Medicaid ACO PMPM file contains the full list of members each month, but indicates when no payment has been made for a member (because of Medicaid ineligibility, evidence of other insurance coverage, or death) for that month.
10. Sec. 10.2.2 states that DVHA’s fiscal agent will continue to receive all claims from VT Medicaid providers and that all claims will continue to be processed through DVHA’s edits and audits. However, 10.4.6 refers to a ACO non-claims response file containing payments to providers not reported at a claim level. Please explain.
Providers are required to submit claims as they have previously, and DVHA’s fiscal agent will continue to process those as they have previously. However, claims for providers electing to receive a prospective payment from the ACO will be zero-paid by DVHA’s fiscal agent upon processing. Through the ‘ACO Non-Claims Response File’, the ACO will detail payments that it makes to any providers being paid prospectively. It is expected that the ACO will make monthly fixed prospective payments to providers regardless of how many claims they submit.

11. Will the year-end reconciliation process to compute the actual cost of care utilize data from FFS claims, zero-based claims and WHPP claims amount or will the calculation be a sum of FFS payments and monthly (adjusted and reconciled) net AIPBP payments?
The Actual Total Cost of Care will be calculated using the sum of FFS payments on behalf of attributed members and the sum of adjusted and reconciled fixed prospective payments (the net AIPBP minus admin and PCCM fee).
12. If the latter, will DHVA perform an analysis of actual cost of care for attributed population based only on claims data (actual and estimated)?
DVHA intends to utilize the WHPP amounts captured for the zero-paid claims in order to understand what would have been spent on services for attributed members absent the prospective payment to the ACO. The total WHPP amount will be compared to the total amount prospectively paid during the year. The WHPP amounts will also be considered in setting ACO rates in future years (i.e. trending forward CY 2017 expenditure to set rates for CY 2019).
13. Sec. 7.0 of the contract (attachment A), states that VCCI will no longer be engaged in care management for the ACO-attributed Medicaid population. Please provide the number of Medicaid members that were receiving care management from VCCI and now have care management assigned to OneCare.
63 Medicaid members who were being case-managed by VCCI at the start of the contract period are now in the process of being transitioned to OneCare for management going forward. The VCCI and OneCare teams have been coordinating to ensure an individualized approach and a 'warm hand-off' for each member. It is expected that this process will be ongoing for the next several weeks.
14. Explain if or how Blueprint activities and Patient-Centered Medical Homes (PCMH) are integrated into this contractual arrangement:
The Blueprint and PCMH activities are not integrated in the contract. The ACO and Blueprint collaborate presently, as they have during the multi-payer shared savings programs during the past several years. Until the ACO has more people enrolled, the Blueprint will likely continue to serve state government to facilitate and encourage practice transformation across the whole population rather than solely the ACO program attributed lives. This is consistent with Blueprint's traditional role focusing on multi-payer health care reform.
- a. For instance, will OneCare's network of primary care providers continue working on Blueprint initiatives? If so, is the cost of this work included in the amount of the contract?
Yes, we anticipate OneCare's network will continue to work on Blueprint initiatives. The ACO contract does not contain terms that would definitively

change the relationship between providers and the Blueprint. Furthermore, the cost of Blueprint related activities is not included in the contract amount.

- b. Do cost savings from those activities and support networks accrue to OneCare, and will they no longer be considered in Blueprint's ROI?

DVHA's goal is to understand savings and ROI related to the ACO and Blueprint separately to judge each program on its actual performance.

- c. Will OneCare's primary care providers receive the PCCM payment that is part of the net AIPBP?

Yes, OneCare primary care providers will continue to receive the PCCM payment. This is a pass-through payment that does not affect the calculation of the AIPBP.

- 15. The sections in Attachment B related to payment for services (D) and distribution of the AIPBP (E) break the DVHA payments into two parts: (1) a monthly "net AIPBP" payment to OCVT that includes covered services billed by ACO-contracted providers, which in total accounts for 64% of the expected total cost of care for the attributed members; and (2) fee-for-service payments paid directly to providers for claims submitted to DVHA, estimated at 36% of the expected total cost of care.

- a. Please confirm that the maximum amount of the contract includes both the net AIPBP payments made directly to OneCare and the FFS payments made by DVHA directly to providers (both affiliated and non-affiliated) for attributed members.

Yes, the maximum contract amount includes both the Net AIPBP payments to OneCare and the FFS payments made by DVHA for attributed members. The maximum contract amount was calculated by assuming all attributed members would have the weighted average Total Cap payment made on their behalf for each of the months of the year:

$\$267.32 \text{ PMPM} * 29,103 \text{ members} * 12 \text{ months} = \$93,357,767.52$

- b. How are the prospective payments to OneCare distributed to providers, and does DVHA have authority to review these distributions?

Please see attached 'Exhibit 1' documents (accompanying the OneCare Provider Base Agreement and Medicaid Addendum) for each of the 4 hospitals that will be receiving prospective payments from OneCare. These describe the mechanism by which prospective payments will be made per each hospital's contract with OneCare. DVHA has the authority to audit actual payments throughout the program year.

- c. If DVHA has the authority to review OneCare's distributions to providers, please describe how DVHA has executed, or plans to execute, this authority.

DVHA plans to exercise its authority to review OneCare's distributions to providers; the approach for doing so is under development.

16. Did OneCare provide primary care physicians with the option of participating in the capitation payment rather than FFS payment? (This was a recommendation of the ACO Payment Subcommittee, convened by GMCB in 2015 and on which OneCare was represented).

OneCare provided the prospective payment option at the organizational (or Tax Identification Number) level, but not at the individual provider level. In the 2017 program year, the four participating hospitals (and any hospital-owned practices under their TINs) elected to be paid prospectively; other participating practices (including independent practices and FQHCs) elected to continue being reimbursed FFS.

17. Under Sec. 10.7, OneCare must “participate in data sharing agreements with any health information technology entity required by DVHA.” The contract does not specify the VHIE, so please provide any documents that explain the current and prospective HIT arrangement.

DVHA has not exercised its authority under this section of the contract. DVHA is generally aware that the ACO has a contractual relationship with VITL, which manages the VHIE.

18. In the presentation given to House Health Care Committee on Wednesday (2/15), DVHA’s share of expenditures over/under 3% of TCOC is shown as zero. However, the contract states that if actual TCOC is between 97% and 100% of expected total TCOC, “OneCare will be entitled to receive from DVHA all savings associated with [those] costs” (p. 83). Please explain.

Slide seven of the presentation to the House Health Care Committee attempts to provide policymakers a simple visual illustration of how a 3% upside/downside risk corridor works. The graphic means to convey that between 97% and 103% of expected total cost of care OneCare is at risk to either earn savings or pay for excess spending. DVHA is not at risk for these payments between 97% and 100%; rather, it is fully obligated to pay for these payments.

The graphic was designed as a prompt for testimony and subsequent committee discussion. The accompanying testimony made the following contract terms clear:

- OneCare is entitled to receive from DVHA all savings between 97% and 100% of the total cost of care;
- OneCare is obligated to pay DVHA all costs between 100% and 103% of the total cost of care
- DVHA shall recoup from OneCare any savings where costs fell below 97% of the total cost of care
- DVHA is entitled to pay all costs in excess of 103% of the total cost of care.

The risk arrangement issue can be difficult to explain. DVHA would gladly discuss with your office ways to make the presentation and related concepts more clear.

Request for Information—DVHA

1. A searchable copy of contract #32318
Please see attached searchable contract.

2. A breakdown of attributed members in each MEG

| MEG (as of 01/01/17) | Number (%) of Attributed Members |
|--|---|
| Aged, Blind, or Disabled (ABD) Adult & Child | 1,910 (6.56%) |
| Consolidated Adult | 12,988 (44.63%) |
| Consolidated Child | 14,205 (48.81%) |
| Total | 29,103 |

3. The trend factors applied to each MEG for calculation of the ETCOC and any explanatory documents
Please see attached actuarial report (p. 17, *D. Trends*, and p. 36, *Appendix B.3 – Capitation Rate Development (Final AIPBP)*) for detail on the trend factors applied and a description of the approach used to derive the trend factors.

4. The total number of OneCare providers and how many of those are primary care providers

| Participating Provider Specialty (as of 01/01/17) | Number (%) of Providers |
|--|--------------------------------|
| Primary Care | 678 (36.93%) |
| Specialist eligible for Attribution | 128 (6.97%) |
| Specialist not eligible for Attribution | 1,030 (56.10 %) |
| Total | 1,836 |

5. The total number of attributed Medicaid members and how many of those are attributed to primary care providers

| Attributing Provider Specialty (as of 01/01/17) | Number (%) of Attributed Members |
|--|---|
| Primary Care | 28,580 (98.20%) |
| Specialist | 523 (1.80%) |
| Total | 29,103 |

6. A copy of OCVT’s network contracts (where contracts are duplicative, one copy will suffice, and attachments with standard language are unnecessary)

Please see attached OneCare Provider Base Agreement and Medicaid Addendum.

7. A copy of the Readiness Review report cited in Attachment B, Sec D.4

Please see attached Readiness Review Report.

8. Sec. 1.2.1 of the SOW states that “the AYs used for the PY are the time periods representing State Fiscal Years 2014 and 2015”; however, the table just below that statement shows the corresponding AYs to be FY 15 & 16. Which is correct?
The table is correct; the sentence excerpted above should read “State Fiscal Years 2015 and 2016.”
- a. If FY2014-15 data were used, please explain why more recent data were not chosen for attribution, especially given the distortions due to delayed redeterminations.
Data from SFY 2015-16 were used.
 - b. Did DVHA’s actuary estimate the total cost of care if the attributed population was based on FY2016? If so, please provide.
The TCOC estimates were based on CY 2015 (the most recent full calendar year of data) and were trended forward to 2017. Please see attached actuarial report for additional detail.
9. Sec. 10 appears to provide a process for monthly adjustment of PMPM payments based on current Medicaid status. Is this correct and does the adjustment include all three components of the net AIPBP monthly payment? Does the Medicaid ACO PMPM File contain only active members?
Yes, PMPM payments are adjusted monthly based on Medicaid eligibility for the prospectively attributed Medicaid members. This applies to all three components of the net AIPBP monthly payment—if a member is ineligible for attribution during a given month, no prospective payments will be made on behalf of that member. The Medicaid ACO PMPM file contains the full list of members each month, but indicates when no payment has been made for a member (because of Medicaid ineligibility, evidence of other insurance coverage, or death) for that month.
10. Sec. 10.2.2 states that DVHA’s fiscal agent will continue to receive all claims from VT Medicaid providers and that all claims will continue to be processed through DVHA’s edits and audits. However, 10.4.6 refers to a ACO non-claims response file containing payments to providers not reported at a claim level. Please explain.
Providers are required to submit claims as they have previously, and DVHA’s fiscal agent will continue to process those as they have previously. However, claims for providers electing to receive a prospective payment from the ACO will be zero-paid by DVHA’s fiscal agent upon processing. Through the ‘ACO Non-Claims Response File’, the ACO will detail payments that it makes to any providers being paid prospectively. It is expected that the ACO will make monthly fixed prospective payments to providers regardless of how many claims they submit.

11. Will the year-end reconciliation process to compute the actual cost of care utilize data from FFS claims, zero-based claims and WHPP claims amount or will the calculation be a sum of FFS payments and monthly (adjusted and reconciled) net AIPBP payments?
The Actual Total Cost of Care will be calculated using the sum of FFS payments on behalf of attributed members and the sum of adjusted and reconciled fixed prospective payments (the net AIPBP minus admin and PCCM fee).
12. If the latter, will DHVA perform an analysis of actual cost of care for attributed population based only on claims data (actual and estimated)?
DVHA intends to utilize the WHPP amounts captured for the zero-paid claims in order to understand what would have been spent on services for attributed members absent the prospective payment to the ACO. The total WHPP amount will be compared to the total amount prospectively paid during the year. The WHPP amounts will also be considered in setting ACO rates in future years (i.e. trending forward CY 2017 expenditure to set rates for CY 2019).
13. Sec. 7.0 of the contract (attachment A), states that VCCI will no longer be engaged in care management for the ACO-attributed Medicaid population. Please provide the number of Medicaid members that were receiving care management from VCCI and now have care management assigned to OneCare.
63 Medicaid members who were being case-managed by VCCI at the start of the contract period are now in the process of being transitioned to OneCare for management going forward. The VCCI and OneCare teams have been coordinating to ensure an individualized approach and a 'warm hand-off' for each member. It is expected that this process will be ongoing for the next several weeks.
14. Explain if or how Blueprint activities and Patient-Centered Medical Homes (PCMH) are integrated into this contractual arrangement:
The Blueprint and PCMH activities are not integrated in the contract. The ACO and Blueprint collaborate presently, as they have during the multi-payer shared savings programs during the past several years. Until the ACO has more people enrolled, the Blueprint will likely continue to serve state government to facilitate and encourage practice transformation across the whole population rather than solely the ACO program attributed lives. This is consistent with Blueprint's traditional role focusing on multi-payer health care reform.
- a. For instance, will OneCare's network of primary care providers continue working on Blueprint initiatives? If so, is the cost of this work included in the amount of the contract?
Yes, we anticipate OneCare's network will continue to work on Blueprint initiatives. The ACO contract does not contain terms that would definitively

change the relationship between providers and the Blueprint. Furthermore, the cost of Blueprint related activities is not included in the contract amount.

- b. Do cost savings from those activities and support networks accrue to OneCare, and will they no longer be considered in Blueprint's ROI?

DVHA's goal is to understand savings and ROI related to the ACO and Blueprint separately to judge each program on its actual performance.

- c. Will OneCare's primary care providers receive the PCCM payment that is part of the net AIPBP?

Yes, OneCare primary care providers will continue to receive the PCCM payment. This is a pass-through payment that does not affect the calculation of the AIPBP.

- 15. The sections in Attachment B related to payment for services (D) and distribution of the AIPBP (E) break the DVHA payments into two parts: (1) a monthly "net AIPBP" payment to OCVT that includes covered services billed by ACO-contracted providers, which in total accounts for 64% of the expected total cost of care for the attributed members; and (2) fee-for-service payments paid directly to providers for claims submitted to DVHA, estimated at 36% of the expected total cost of care.

- a. Please confirm that the maximum amount of the contract includes both the net AIPBP payments made directly to OneCare and the FFS payments made by DVHA directly to providers (both affiliated and non-affiliated) for attributed members.

Yes, the maximum contract amount includes both the Net AIPBP payments to OneCare and the FFS payments made by DVHA for attributed members. The maximum contract amount was calculated by assuming all attributed members would have the weighted average Total Cap payment made on their behalf for each of the months of the year:

$\$267.32 \text{ PMPM} * 29,103 \text{ members} * 12 \text{ months} = \$93,357,767.52$

- b. How are the prospective payments to OneCare distributed to providers, and does DVHA have authority to review these distributions?

Please see attached 'Exhibit 1' documents (accompanying the OneCare Provider Base Agreement and Medicaid Addendum) for each of the 4 hospitals that will be receiving prospective payments from OneCare. These describe the mechanism by which prospective payments will be made per each hospital's contract with OneCare. DVHA has the authority to audit actual payments throughout the program year.

- c. If DVHA has the authority to review OneCare's distributions to providers, please describe how DVHA has executed, or plans to execute, this authority.

DVHA plans to exercise its authority to review OneCare's distributions to providers; the approach for doing so is under development.

16. Did OneCare provide primary care physicians with the option of participating in the capitation payment rather than FFS payment? (This was a recommendation of the ACO Payment Subcommittee, convened by GMCB in 2015 and on which OneCare was represented).

OneCare provided the prospective payment option at the organizational (or Tax Identification Number) level, but not at the individual provider level. In the 2017 program year, the four participating hospitals (and any hospital-owned practices under their TINs) elected to be paid prospectively; other participating practices (including independent practices and FQHCs) elected to continue being reimbursed FFS.

17. Under Sec. 10.7, OneCare must “participate in data sharing agreements with any health information technology entity required by DVHA.” The contract does not specify the VHIE, so please provide any documents that explain the current and prospective HIT arrangement.

DVHA has not exercised its authority under this section of the contract. DVHA is generally aware that the ACO has a contractual relationship with VITL, which manages the VHIE.

18. In the presentation given to House Health Care Committee on Wednesday (2/15), DVHA’s share of expenditures over/under 3% of TCOC is shown as zero. However, the contract states that if actual TCOC is between 97% and 100% of expected total TCOC, “OneCare will be entitled to receive from DVHA all savings associated with [those] costs” (p. 83). Please explain.

Slide seven of the presentation to the House Health Care Committee attempts to provide policymakers a simple visual illustration of how a 3% upside/downside risk corridor works. The graphic means to convey that between 97% and 103% of expected total cost of care OneCare is at risk to either earn savings or pay for excess spending. DVHA is not at risk for these payments between 97% and 100%; rather, it is fully obligated to pay for these payments.

The graphic was designed as a prompt for testimony and subsequent committee discussion. The accompanying testimony made the following contract terms clear:

- OneCare is entitled to receive from DVHA all savings between 97% and 100% of the total cost of care;
- OneCare is obligated to pay DVHA all costs between 100% and 103% of the total cost of care
- DVHA shall recoup from OneCare any savings where costs fell below 97% of the total cost of care
- DVHA is entitled to pay all costs in excess of 103% of the total cost of care.

The risk arrangement issue can be difficult to explain. DVHA would gladly discuss with your office ways to make the presentation and related concepts more clear.

Request for Information—DVHA

1. A searchable copy of contract #32318
Please see attached searchable contract.

2. A breakdown of attributed members in each MEG

| MEG (as of 01/01/17) | Number (%) of Attributed Members |
|--|---|
| Aged, Blind, or Disabled (ABD) Adult & Child | 1,910 (6.56%) |
| Consolidated Adult | 12,988 (44.63%) |
| Consolidated Child | 14,205 (48.81%) |
| Total | 29,103 |

3. The trend factors applied to each MEG for calculation of the ETCOC and any explanatory documents
Please see attached actuarial report (p. 17, *D. Trends*, and p. 36, *Appendix B.3 – Capitation Rate Development (Final AIPBP)*) for detail on the trend factors applied and a description of the approach used to derive the trend factors.

4. The total number of OneCare providers and how many of those are primary care providers

| Participating Provider Specialty (as of 01/01/17) | Number (%) of Providers |
|--|--------------------------------|
| Primary Care | 678 (36.93%) |
| Specialist eligible for Attribution | 128 (6.97%) |
| Specialist not eligible for Attribution | 1,030 (56.10 %) |
| Total | 1,836 |

5. The total number of attributed Medicaid members and how many of those are attributed to primary care providers

| Attributing Provider Specialty (as of 01/01/17) | Number (%) of Attributed Members |
|--|---|
| Primary Care | 28,580 (98.20%) |
| Specialist | 523 (1.80%) |
| Total | 29,103 |

6. A copy of OCVT’s network contracts (where contracts are duplicative, one copy will suffice, and attachments with standard language are unnecessary)

Please see attached OneCare Provider Base Agreement and Medicaid Addendum.

7. A copy of the Readiness Review report cited in Attachment B, Sec D.4

Please see attached Readiness Review Report.

8. Sec. 1.2.1 of the SOW states that “the AYs used for the PY are the time periods representing State Fiscal Years 2014 and 2015”; however, the table just below that statement shows the corresponding AYs to be FY 15 & 16. Which is correct?
The table is correct; the sentence excerpted above should read “State Fiscal Years 2015 and 2016.”
- a. If FY2014-15 data were used, please explain why more recent data were not chosen for attribution, especially given the distortions due to delayed redeterminations.
Data from SFY 2015-16 were used.
 - b. Did DVHA’s actuary estimate the total cost of care if the attributed population was based on FY2016? If so, please provide.
The TCOC estimates were based on CY 2015 (the most recent full calendar year of data) and were trended forward to 2017. Please see attached actuarial report for additional detail.
9. Sec. 10 appears to provide a process for monthly adjustment of PMPM payments based on current Medicaid status. Is this correct and does the adjustment include all three components of the net AIPBP monthly payment? Does the Medicaid ACO PMPM File contain only active members?
Yes, PMPM payments are adjusted monthly based on Medicaid eligibility for the prospectively attributed Medicaid members. This applies to all three components of the net AIPBP monthly payment—if a member is ineligible for attribution during a given month, no prospective payments will be made on behalf of that member. The Medicaid ACO PMPM file contains the full list of members each month, but indicates when no payment has been made for a member (because of Medicaid ineligibility, evidence of other insurance coverage, or death) for that month.
10. Sec. 10.2.2 states that DVHA’s fiscal agent will continue to receive all claims from VT Medicaid providers and that all claims will continue to be processed through DVHA’s edits and audits. However, 10.4.6 refers to a ACO non-claims response file containing payments to providers not reported at a claim level. Please explain.
Providers are required to submit claims as they have previously, and DVHA’s fiscal agent will continue to process those as they have previously. However, claims for providers electing to receive a prospective payment from the ACO will be zero-paid by DVHA’s fiscal agent upon processing. Through the ‘ACO Non-Claims Response File’, the ACO will detail payments that it makes to any providers being paid prospectively. It is expected that the ACO will make monthly fixed prospective payments to providers regardless of how many claims they submit.

11. Will the year-end reconciliation process to compute the actual cost of care utilize data from FFS claims, zero-based claims and WHPP claims amount or will the calculation be a sum of FFS payments and monthly (adjusted and reconciled) net AIPBP payments?
The Actual Total Cost of Care will be calculated using the sum of FFS payments on behalf of attributed members and the sum of adjusted and reconciled fixed prospective payments (the net AIPBP minus admin and PCCM fee).
12. If the latter, will DHVA perform an analysis of actual cost of care for attributed population based only on claims data (actual and estimated)?
DVHA intends to utilize the WHPP amounts captured for the zero-paid claims in order to understand what would have been spent on services for attributed members absent the prospective payment to the ACO. The total WHPP amount will be compared to the total amount prospectively paid during the year. The WHPP amounts will also be considered in setting ACO rates in future years (i.e. trending forward CY 2017 expenditure to set rates for CY 2019).
13. Sec. 7.0 of the contract (attachment A), states that VCCI will no longer be engaged in care management for the ACO-attributed Medicaid population. Please provide the number of Medicaid members that were receiving care management from VCCI and now have care management assigned to OneCare.
63 Medicaid members who were being case-managed by VCCI at the start of the contract period are now in the process of being transitioned to OneCare for management going forward. The VCCI and OneCare teams have been coordinating to ensure an individualized approach and a 'warm hand-off' for each member. It is expected that this process will be ongoing for the next several weeks.
14. Explain if or how Blueprint activities and Patient-Centered Medical Homes (PCMH) are integrated into this contractual arrangement:
The Blueprint and PCMH activities are not integrated in the contract. The ACO and Blueprint collaborate presently, as they have during the multi-payer shared savings programs during the past several years. Until the ACO has more people enrolled, the Blueprint will likely continue to serve state government to facilitate and encourage practice transformation across the whole population rather than solely the ACO program attributed lives. This is consistent with Blueprint's traditional role focusing on multi-payer health care reform.
- a. For instance, will OneCare's network of primary care providers continue working on Blueprint initiatives? If so, is the cost of this work included in the amount of the contract?
Yes, we anticipate OneCare's network will continue to work on Blueprint initiatives. The ACO contract does not contain terms that would definitively

change the relationship between providers and the Blueprint. Furthermore, the cost of Blueprint related activities is not included in the contract amount.

- b. Do cost savings from those activities and support networks accrue to OneCare, and will they no longer be considered in Blueprint's ROI?

DVHA's goal is to understand savings and ROI related to the ACO and Blueprint separately to judge each program on its actual performance.

- c. Will OneCare's primary care providers receive the PCCM payment that is part of the net AIPBP?

Yes, OneCare primary care providers will continue to receive the PCCM payment. This is a pass-through payment that does not affect the calculation of the AIPBP.

- 15. The sections in Attachment B related to payment for services (D) and distribution of the AIPBP (E) break the DVHA payments into two parts: (1) a monthly "net AIPBP" payment to OCVT that includes covered services billed by ACO-contracted providers, which in total accounts for 64% of the expected total cost of care for the attributed members; and (2) fee-for-service payments paid directly to providers for claims submitted to DVHA, estimated at 36% of the expected total cost of care.

- a. Please confirm that the maximum amount of the contract includes both the net AIPBP payments made directly to OneCare and the FFS payments made by DVHA directly to providers (both affiliated and non-affiliated) for attributed members.

Yes, the maximum contract amount includes both the Net AIPBP payments to OneCare and the FFS payments made by DVHA for attributed members. The maximum contract amount was calculated by assuming all attributed members would have the weighted average Total Cap payment made on their behalf for each of the months of the year:

$\$267.32 \text{ PMPM} * 29,103 \text{ members} * 12 \text{ months} = \$93,357,767.52$

- b. How are the prospective payments to OneCare distributed to providers, and does DVHA have authority to review these distributions?

Please see attached 'Exhibit 1' documents (accompanying the OneCare Provider Base Agreement and Medicaid Addendum) for each of the 4 hospitals that will be receiving prospective payments from OneCare. These describe the mechanism by which prospective payments will be made per each hospital's contract with OneCare. DVHA has the authority to audit actual payments throughout the program year.

- c. If DVHA has the authority to review OneCare's distributions to providers, please describe how DVHA has executed, or plans to execute, this authority.

DVHA plans to exercise its authority to review OneCare's distributions to providers; the approach for doing so is under development.

16. Did OneCare provide primary care physicians with the option of participating in the capitation payment rather than FFS payment? (This was a recommendation of the ACO Payment Subcommittee, convened by GMCB in 2015 and on which OneCare was represented).

OneCare provided the prospective payment option at the organizational (or Tax Identification Number) level, but not at the individual provider level. In the 2017 program year, the four participating hospitals (and any hospital-owned practices under their TINs) elected to be paid prospectively; other participating practices (including independent practices and FQHCs) elected to continue being reimbursed FFS.

17. Under Sec. 10.7, OneCare must “participate in data sharing agreements with any health information technology entity required by DVHA.” The contract does not specify the VHIE, so please provide any documents that explain the current and prospective HIT arrangement.

DVHA has not exercised its authority under this section of the contract. DVHA is generally aware that the ACO has a contractual relationship with VITL, which manages the VHIE.

18. In the presentation given to House Health Care Committee on Wednesday (2/15), DVHA’s share of expenditures over/under 3% of TCOC is shown as zero. However, the contract states that if actual TCOC is between 97% and 100% of expected total TCOC, “OneCare will be entitled to receive from DVHA all savings associated with [those] costs” (p. 83). Please explain.

Slide seven of the presentation to the House Health Care Committee attempts to provide policymakers a simple visual illustration of how a 3% upside/downside risk corridor works. The graphic means to convey that between 97% and 103% of expected total cost of care OneCare is at risk to either earn savings or pay for excess spending. DVHA is not at risk for these payments between 97% and 100%; rather, it is fully obligated to pay for these payments.

The graphic was designed as a prompt for testimony and subsequent committee discussion. The accompanying testimony made the following contract terms clear:

- OneCare is entitled to receive from DVHA all savings between 97% and 100% of the total cost of care;
- OneCare is obligated to pay DVHA all costs between 100% and 103% of the total cost of care
- DVHA shall recoup from OneCare any savings where costs fell below 97% of the total cost of care
- DVHA is entitled to pay all costs in excess of 103% of the total cost of care.

The risk arrangement issue can be difficult to explain. DVHA would gladly discuss with your office ways to make the presentation and related concepts more clear.

Request for Information—DVHA

1. A searchable copy of contract #32318
Please see attached searchable contract.

2. A breakdown of attributed members in each MEG

| MEG (as of 01/01/17) | Number (%) of Attributed Members |
|--|---|
| Aged, Blind, or Disabled (ABD) Adult & Child | 1,910 (6.56%) |
| Consolidated Adult | 12,988 (44.63%) |
| Consolidated Child | 14,205 (48.81%) |
| Total | 29,103 |

3. The trend factors applied to each MEG for calculation of the ETCOC and any explanatory documents
Please see attached actuarial report (p. 17, *D. Trends*, and p. 36, *Appendix B.3 – Capitation Rate Development (Final AIPBP)*) for detail on the trend factors applied and a description of the approach used to derive the trend factors.

4. The total number of OneCare providers and how many of those are primary care providers

| Participating Provider Specialty (as of 01/01/17) | Number (%) of Providers |
|--|--------------------------------|
| Primary Care | 678 (36.93%) |
| Specialist eligible for Attribution | 128 (6.97%) |
| Specialist not eligible for Attribution | 1,030 (56.10 %) |
| Total | 1,836 |

5. The total number of attributed Medicaid members and how many of those are attributed to primary care providers

| Attributing Provider Specialty (as of 01/01/17) | Number (%) of Attributed Members |
|--|---|
| Primary Care | 28,580 (98.20%) |
| Specialist | 523 (1.80%) |
| Total | 29,103 |

6. A copy of OCVT’s network contracts (where contracts are duplicative, one copy will suffice, and attachments with standard language are unnecessary)

Please see attached [OneCare Provider Base Agreement and Medicaid Addendum](#).

7. A copy of the Readiness Review report cited in Attachment B, Sec D.4

Please see attached [Readiness Review Report](#).

8. Sec. 1.2.1 of the SOW states that “the AYs used for the PY are the time periods representing State Fiscal Years 2014 and 2015”; however, the table just below that statement shows the corresponding AYs to be FY 15 & 16. Which is correct?
The table is correct; the sentence excerpted above should read “State Fiscal Years 2015 and 2016.”
- a. If FY2014-15 data were used, please explain why more recent data were not chosen for attribution, especially given the distortions due to delayed redeterminations.
Data from SFY 2015-16 were used.
 - b. Did DVHA’s actuary estimate the total cost of care if the attributed population was based on FY2016? If so, please provide.
The TCOC estimates were based on CY 2015 (the most recent full calendar year of data) and were trended forward to 2017. Please see attached actuarial report for additional detail.
9. Sec. 10 appears to provide a process for monthly adjustment of PMPM payments based on current Medicaid status. Is this correct and does the adjustment include all three components of the net AIPBP monthly payment? Does the Medicaid ACO PMPM File contain only active members?
Yes, PMPM payments are adjusted monthly based on Medicaid eligibility for the prospectively attributed Medicaid members. This applies to all three components of the net AIPBP monthly payment—if a member is ineligible for attribution during a given month, no prospective payments will be made on behalf of that member. The Medicaid ACO PMPM file contains the full list of members each month, but indicates when no payment has been made for a member (because of Medicaid ineligibility, evidence of other insurance coverage, or death) for that month.
10. Sec. 10.2.2 states that DVHA’s fiscal agent will continue to receive all claims from VT Medicaid providers and that all claims will continue to be processed through DVHA’s edits and audits. However, 10.4.6 refers to a ACO non-claims response file containing payments to providers not reported at a claim level. Please explain.
Providers are required to submit claims as they have previously, and DVHA’s fiscal agent will continue to process those as they have previously. However, claims for providers electing to receive a prospective payment from the ACO will be zero-paid by DVHA’s fiscal agent upon processing. Through the ‘ACO Non-Claims Response File’, the ACO will detail payments that it makes to any providers being paid prospectively. It is expected that the ACO will make monthly fixed prospective payments to providers regardless of how many claims they submit.

11. Will the year-end reconciliation process to compute the actual cost of care utilize data from FFS claims, zero-based claims and WHPP claims amount or will the calculation be a sum of FFS payments and monthly (adjusted and reconciled) net AIPBP payments?
The Actual Total Cost of Care will be calculated using the sum of FFS payments on behalf of attributed members and the sum of adjusted and reconciled fixed prospective payments (the net AIPBP minus admin and PCCM fee).
12. If the latter, will DHVA perform an analysis of actual cost of care for attributed population based only on claims data (actual and estimated)?
DVHA intends to utilize the WHPP amounts captured for the zero-paid claims in order to understand what would have been spent on services for attributed members absent the prospective payment to the ACO. The total WHPP amount will be compared to the total amount prospectively paid during the year. The WHPP amounts will also be considered in setting ACO rates in future years (i.e. trending forward CY 2017 expenditure to set rates for CY 2019).
13. Sec. 7.0 of the contract (attachment A), states that VCCI will no longer be engaged in care management for the ACO-attributed Medicaid population. Please provide the number of Medicaid members that were receiving care management from VCCI and now have care management assigned to OneCare.
63 Medicaid members who were being case-managed by VCCI at the start of the contract period are now in the process of being transitioned to OneCare for management going forward. The VCCI and OneCare teams have been coordinating to ensure an individualized approach and a 'warm hand-off' for each member. It is expected that this process will be ongoing for the next several weeks.
14. Explain if or how Blueprint activities and Patient-Centered Medical Homes (PCMH) are integrated into this contractual arrangement:
The Blueprint and PCMH activities are not integrated in the contract. The ACO and Blueprint collaborate presently, as they have during the multi-payer shared savings programs during the past several years. Until the ACO has more people enrolled, the Blueprint will likely continue to serve state government to facilitate and encourage practice transformation across the whole population rather than solely the ACO program attributed lives. This is consistent with Blueprint's traditional role focusing on multi-payer health care reform.
- a. For instance, will OneCare's network of primary care providers continue working on Blueprint initiatives? If so, is the cost of this work included in the amount of the contract?
Yes, we anticipate OneCare's network will continue to work on Blueprint initiatives. The ACO contract does not contain terms that would definitively

change the relationship between providers and the Blueprint. Furthermore, the cost of Blueprint related activities is not included in the contract amount.

- b. Do cost savings from those activities and support networks accrue to OneCare, and will they no longer be considered in Blueprint's ROI?

DVHA's goal is to understand savings and ROI related to the ACO and Blueprint separately to judge each program on its actual performance.

- c. Will OneCare's primary care providers receive the PCCM payment that is part of the net AIPBP?

Yes, OneCare primary care providers will continue to receive the PCCM payment. This is a pass-through payment that does not affect the calculation of the AIPBP.

- 15. The sections in Attachment B related to payment for services (D) and distribution of the AIPBP (E) break the DVHA payments into two parts: (1) a monthly "net AIPBP" payment to OCVT that includes covered services billed by ACO-contracted providers, which in total accounts for 64% of the expected total cost of care for the attributed members; and (2) fee-for-service payments paid directly to providers for claims submitted to DVHA, estimated at 36% of the expected total cost of care.

- a. Please confirm that the maximum amount of the contract includes both the net AIPBP payments made directly to OneCare and the FFS payments made by DVHA directly to providers (both affiliated and non-affiliated) for attributed members.

Yes, the maximum contract amount includes both the Net AIPBP payments to OneCare and the FFS payments made by DVHA for attributed members. The maximum contract amount was calculated by assuming all attributed members would have the weighted average Total Cap payment made on their behalf for each of the months of the year:

$\$267.32 \text{ PMPM} * 29,103 \text{ members} * 12 \text{ months} = \$93,357,767.52$

- b. How are the prospective payments to OneCare distributed to providers, and does DVHA have authority to review these distributions?

Please see attached 'Exhibit 1' documents (accompanying the OneCare Provider Base Agreement and Medicaid Addendum) for each of the 4 hospitals that will be receiving prospective payments from OneCare. These describe the mechanism by which prospective payments will be made per each hospital's contract with OneCare. DVHA has the authority to audit actual payments throughout the program year.

- c. If DVHA has the authority to review OneCare's distributions to providers, please describe how DVHA has executed, or plans to execute, this authority.

DVHA plans to exercise its authority to review OneCare's distributions to providers; the approach for doing so is under development.

16. Did OneCare provide primary care physicians with the option of participating in the capitation payment rather than FFS payment? (This was a recommendation of the ACO Payment Subcommittee, convened by GMCB in 2015 and on which OneCare was represented).

OneCare provided the prospective payment option at the organizational (or Tax Identification Number) level, but not at the individual provider level. In the 2017 program year, the four participating hospitals (and any hospital-owned practices under their TINs) elected to be paid prospectively; other participating practices (including independent practices and FQHCs) elected to continue being reimbursed FFS.

17. Under Sec. 10.7, OneCare must “participate in data sharing agreements with any health information technology entity required by DVHA.” The contract does not specify the VHIE, so please provide any documents that explain the current and prospective HIT arrangement.

DVHA has not exercised its authority under this section of the contract. DVHA is generally aware that the ACO has a contractual relationship with VITL, which manages the VHIE.

18. In the presentation given to House Health Care Committee on Wednesday (2/15), DVHA’s share of expenditures over/under 3% of TCOC is shown as zero. However, the contract states that if actual TCOC is between 97% and 100% of expected total TCOC, “OneCare will be entitled to receive from DVHA all savings associated with [those] costs” (p. 83). Please explain.

Slide seven of the presentation to the House Health Care Committee attempts to provide policymakers a simple visual illustration of how a 3% upside/downside risk corridor works. The graphic means to convey that between 97% and 103% of expected total cost of care OneCare is at risk to either earn savings or pay for excess spending. DVHA is not at risk for these payments between 97% and 100%; rather, it is fully obligated to pay for these payments.

The graphic was designed as a prompt for testimony and subsequent committee discussion. The accompanying testimony made the following contract terms clear:

- OneCare is entitled to receive from DVHA all savings between 97% and 100% of the total cost of care;
- OneCare is obligated to pay DVHA all costs between 100% and 103% of the total cost of care
- DVHA shall recoup from OneCare any savings where costs fell below 97% of the total cost of care
- DVHA is entitled to pay all costs in excess of 103% of the total cost of care.

The risk arrangement issue can be difficult to explain. DVHA would gladly discuss with your office ways to make the presentation and related concepts more clear.

Request for Information—DVHA

1. A searchable copy of contract #32318
Please see attached searchable contract.

2. A breakdown of attributed members in each MEG

| MEG (as of 01/01/17) | Number (%) of Attributed Members |
|--|---|
| Aged, Blind, or Disabled (ABD) Adult & Child | 1,910 (6.56%) |
| Consolidated Adult | 12,988 (44.63%) |
| Consolidated Child | 14,205 (48.81%) |
| Total | 29,103 |

3. The trend factors applied to each MEG for calculation of the ETCOC and any explanatory documents
Please see attached actuarial report (p. 17, *D. Trends*, and p. 36, *Appendix B.3 – Capitation Rate Development (Final AIPBP)*) for detail on the trend factors applied and a description of the approach used to derive the trend factors.

4. The total number of OneCare providers and how many of those are primary care providers

| Participating Provider Specialty (as of 01/01/17) | Number (%) of Providers |
|--|--------------------------------|
| Primary Care | 678 (36.93%) |
| Specialist eligible for Attribution | 128 (6.97%) |
| Specialist not eligible for Attribution | 1,030 (56.10 %) |
| Total | 1,836 |

5. The total number of attributed Medicaid members and how many of those are attributed to primary care providers

| Attributing Provider Specialty (as of 01/01/17) | Number (%) of Attributed Members |
|--|---|
| Primary Care | 28,580 (98.20%) |
| Specialist | 523 (1.80%) |
| Total | 29,103 |

6. A copy of OCVT’s network contracts (where contracts are duplicative, one copy will suffice, and attachments with standard language are unnecessary)

Please see attached OneCare Provider Base Agreement and Medicaid Addendum.

7. A copy of the Readiness Review report cited in Attachment B, Sec D.4

Please see attached Readiness Review Report.

8. Sec. 1.2.1 of the SOW states that “the AYs used for the PY are the time periods representing State Fiscal Years 2014 and 2015”; however, the table just below that statement shows the corresponding AYs to be FY 15 & 16. Which is correct?
The table is correct; the sentence excerpted above should read “State Fiscal Years 2015 and 2016.”
- a. If FY2014-15 data were used, please explain why more recent data were not chosen for attribution, especially given the distortions due to delayed redeterminations.
Data from SFY 2015-16 were used.
 - b. Did DVHA’s actuary estimate the total cost of care if the attributed population was based on FY2016? If so, please provide.
The TCOC estimates were based on CY 2015 (the most recent full calendar year of data) and were trended forward to 2017. Please see attached actuarial report for additional detail.
9. Sec. 10 appears to provide a process for monthly adjustment of PMPM payments based on current Medicaid status. Is this correct and does the adjustment include all three components of the net AIPBP monthly payment? Does the Medicaid ACO PMPM File contain only active members?
Yes, PMPM payments are adjusted monthly based on Medicaid eligibility for the prospectively attributed Medicaid members. This applies to all three components of the net AIPBP monthly payment—if a member is ineligible for attribution during a given month, no prospective payments will be made on behalf of that member. The Medicaid ACO PMPM file contains the full list of members each month, but indicates when no payment has been made for a member (because of Medicaid ineligibility, evidence of other insurance coverage, or death) for that month.
10. Sec. 10.2.2 states that DVHA’s fiscal agent will continue to receive all claims from VT Medicaid providers and that all claims will continue to be processed through DVHA’s edits and audits. However, 10.4.6 refers to a ACO non-claims response file containing payments to providers not reported at a claim level. Please explain.
Providers are required to submit claims as they have previously, and DVHA’s fiscal agent will continue to process those as they have previously. However, claims for providers electing to receive a prospective payment from the ACO will be zero-paid by DVHA’s fiscal agent upon processing. Through the ‘ACO Non-Claims Response File’, the ACO will detail payments that it makes to any providers being paid prospectively. It is expected that the ACO will make monthly fixed prospective payments to providers regardless of how many claims they submit.

11. Will the year-end reconciliation process to compute the actual cost of care utilize data from FFS claims, zero-based claims and WHPP claims amount or will the calculation be a sum of FFS payments and monthly (adjusted and reconciled) net AIPBP payments?
The Actual Total Cost of Care will be calculated using the sum of FFS payments on behalf of attributed members and the sum of adjusted and reconciled fixed prospective payments (the net AIPBP minus admin and PCCM fee).
12. If the latter, will DHVA perform an analysis of actual cost of care for attributed population based only on claims data (actual and estimated)?
DVHA intends to utilize the WHPP amounts captured for the zero-paid claims in order to understand what would have been spent on services for attributed members absent the prospective payment to the ACO. The total WHPP amount will be compared to the total amount prospectively paid during the year. The WHPP amounts will also be considered in setting ACO rates in future years (i.e. trending forward CY 2017 expenditure to set rates for CY 2019).
13. Sec. 7.0 of the contract (attachment A), states that VCCI will no longer be engaged in care management for the ACO-attributed Medicaid population. Please provide the number of Medicaid members that were receiving care management from VCCI and now have care management assigned to OneCare.
63 Medicaid members who were being case-managed by VCCI at the start of the contract period are now in the process of being transitioned to OneCare for management going forward. The VCCI and OneCare teams have been coordinating to ensure an individualized approach and a 'warm hand-off' for each member. It is expected that this process will be ongoing for the next several weeks.
14. Explain if or how Blueprint activities and Patient-Centered Medical Homes (PCMH) are integrated into this contractual arrangement:
The Blueprint and PCMH activities are not integrated in the contract. The ACO and Blueprint collaborate presently, as they have during the multi-payer shared savings programs during the past several years. Until the ACO has more people enrolled, the Blueprint will likely continue to serve state government to facilitate and encourage practice transformation across the whole population rather than solely the ACO program attributed lives. This is consistent with Blueprint's traditional role focusing on multi-payer health care reform.
 - a. For instance, will OneCare's network of primary care providers continue working on Blueprint initiatives? If so, is the cost of this work included in the amount of the contract?
Yes, we anticipate OneCare's network will continue to work on Blueprint initiatives. The ACO contract does not contain terms that would definitively

change the relationship between providers and the Blueprint. Furthermore, the cost of Blueprint related activities is not included in the contract amount.

- b. Do cost savings from those activities and support networks accrue to OneCare, and will they no longer be considered in Blueprint's ROI?

DVHA's goal is to understand savings and ROI related to the ACO and Blueprint separately to judge each program on its actual performance.

- c. Will OneCare's primary care providers receive the PCCM payment that is part of the net AIPBP?

Yes, OneCare primary care providers will continue to receive the PCCM payment. This is a pass-through payment that does not affect the calculation of the AIPBP.

- 15. The sections in Attachment B related to payment for services (D) and distribution of the AIPBP (E) break the DVHA payments into two parts: (1) a monthly "net AIPBP" payment to OCVT that includes covered services billed by ACO-contracted providers, which in total accounts for 64% of the expected total cost of care for the attributed members; and (2) fee-for-service payments paid directly to providers for claims submitted to DVHA, estimated at 36% of the expected total cost of care.

- a. Please confirm that the maximum amount of the contract includes both the net AIPBP payments made directly to OneCare and the FFS payments made by DVHA directly to providers (both affiliated and non-affiliated) for attributed members.

Yes, the maximum contract amount includes both the Net AIPBP payments to OneCare and the FFS payments made by DVHA for attributed members. The maximum contract amount was calculated by assuming all attributed members would have the weighted average Total Cap payment made on their behalf for each of the months of the year:

$\$267.32 \text{ PMPM} * 29,103 \text{ members} * 12 \text{ months} = \$93,357,767.52$

- b. How are the prospective payments to OneCare distributed to providers, and does DVHA have authority to review these distributions?

Please see attached 'Exhibit 1' documents (accompanying the OneCare Provider Base Agreement and Medicaid Addendum) for each of the 4 hospitals that will be receiving prospective payments from OneCare. These describe the mechanism by which prospective payments will be made per each hospital's contract with OneCare. DVHA has the authority to audit actual payments throughout the program year.

- c. If DVHA has the authority to review OneCare's distributions to providers, please describe how DVHA has executed, or plans to execute, this authority.

DVHA plans to exercise its authority to review OneCare's distributions to providers; the approach for doing so is under development.

16. Did OneCare provide primary care physicians with the option of participating in the capitation payment rather than FFS payment? (This was a recommendation of the ACO Payment Subcommittee, convened by GMCB in 2015 and on which OneCare was represented).

OneCare provided the prospective payment option at the organizational (or Tax Identification Number) level, but not at the individual provider level. In the 2017 program year, the four participating hospitals (and any hospital-owned practices under their TINs) elected to be paid prospectively; other participating practices (including independent practices and FQHCs) elected to continue being reimbursed FFS.

17. Under Sec. 10.7, OneCare must “participate in data sharing agreements with any health information technology entity required by DVHA.” The contract does not specify the VHIE, so please provide any documents that explain the current and prospective HIT arrangement.

DVHA has not exercised its authority under this section of the contract. DVHA is generally aware that the ACO has a contractual relationship with VITL, which manages the VHIE.

18. In the presentation given to House Health Care Committee on Wednesday (2/15), DVHA’s share of expenditures over/under 3% of TCOC is shown as zero. However, the contract states that if actual TCOC is between 97% and 100% of expected total TCOC, “OneCare will be entitled to receive from DVHA all savings associated with [those] costs” (p. 83). Please explain.

Slide seven of the presentation to the House Health Care Committee attempts to provide policymakers a simple visual illustration of how a 3% upside/downside risk corridor works. The graphic means to convey that between 97% and 103% of expected total cost of care OneCare is at risk to either earn savings or pay for excess spending. DVHA is not at risk for these payments between 97% and 100%; rather, it is fully obligated to pay for these payments.

The graphic was designed as a prompt for testimony and subsequent committee discussion. The accompanying testimony made the following contract terms clear:

- OneCare is entitled to receive from DVHA all savings between 97% and 100% of the total cost of care;
- OneCare is obligated to pay DVHA all costs between 100% and 103% of the total cost of care
- DVHA shall recoup from OneCare any savings where costs fell below 97% of the total cost of care
- DVHA is entitled to pay all costs in excess of 103% of the total cost of care.

The risk arrangement issue can be difficult to explain. DVHA would gladly discuss with your office ways to make the presentation and related concepts more clear.

Request for Information—DVHA

1. A searchable copy of contract #32318
Please see attached searchable contract.

2. A breakdown of attributed members in each MEG

| MEG (as of 01/01/17) | Number (%) of Attributed Members |
|--|---|
| Aged, Blind, or Disabled (ABD) Adult & Child | 1,910 (6.56%) |
| Consolidated Adult | 12,988 (44.63%) |
| Consolidated Child | 14,205 (48.81%) |
| Total | 29,103 |

3. The trend factors applied to each MEG for calculation of the ETCOC and any explanatory documents
Please see attached actuarial report (p. 17, *D. Trends*, and p. 36, *Appendix B.3 – Capitation Rate Development (Final AIPBP)*) for detail on the trend factors applied and a description of the approach used to derive the trend factors.

4. The total number of OneCare providers and how many of those are primary care providers

| Participating Provider Specialty (as of 01/01/17) | Number (%) of Providers |
|--|--------------------------------|
| Primary Care | 678 (36.93%) |
| Specialist eligible for Attribution | 128 (6.97%) |
| Specialist not eligible for Attribution | 1,030 (56.10 %) |
| Total | 1,836 |

5. The total number of attributed Medicaid members and how many of those are attributed to primary care providers

| Attributing Provider Specialty (as of 01/01/17) | Number (%) of Attributed Members |
|--|---|
| Primary Care | 28,580 (98.20%) |
| Specialist | 523 (1.80%) |
| Total | 29,103 |

6. A copy of OCVT’s network contracts (where contracts are duplicative, one copy will suffice, and attachments with standard language are unnecessary)

Please see attached OneCare Provider Base Agreement and Medicaid Addendum.

7. A copy of the Readiness Review report cited in Attachment B, Sec D.4

Please see attached Readiness Review Report.

8. Sec. 1.2.1 of the SOW states that “the AYs used for the PY are the time periods representing State Fiscal Years 2014 and 2015”; however, the table just below that statement shows the corresponding AYs to be FY 15 & 16. Which is correct?
The table is correct; the sentence excerpted above should read “State Fiscal Years 2015 and 2016.”
- a. If FY2014-15 data were used, please explain why more recent data were not chosen for attribution, especially given the distortions due to delayed redeterminations.
Data from SFY 2015-16 were used.
 - b. Did DVHA’s actuary estimate the total cost of care if the attributed population was based on FY2016? If so, please provide.
The TCOC estimates were based on CY 2015 (the most recent full calendar year of data) and were trended forward to 2017. Please see attached actuarial report for additional detail.
9. Sec. 10 appears to provide a process for monthly adjustment of PMPM payments based on current Medicaid status. Is this correct and does the adjustment include all three components of the net AIPBP monthly payment? Does the Medicaid ACO PMPM File contain only active members?
Yes, PMPM payments are adjusted monthly based on Medicaid eligibility for the prospectively attributed Medicaid members. This applies to all three components of the net AIPBP monthly payment—if a member is ineligible for attribution during a given month, no prospective payments will be made on behalf of that member. The Medicaid ACO PMPM file contains the full list of members each month, but indicates when no payment has been made for a member (because of Medicaid ineligibility, evidence of other insurance coverage, or death) for that month.
10. Sec. 10.2.2 states that DVHA’s fiscal agent will continue to receive all claims from VT Medicaid providers and that all claims will continue to be processed through DVHA’s edits and audits. However, 10.4.6 refers to a ACO non-claims response file containing payments to providers not reported at a claim level. Please explain.
Providers are required to submit claims as they have previously, and DVHA’s fiscal agent will continue to process those as they have previously. However, claims for providers electing to receive a prospective payment from the ACO will be zero-paid by DVHA’s fiscal agent upon processing. Through the ‘ACO Non-Claims Response File’, the ACO will detail payments that it makes to any providers being paid prospectively. It is expected that the ACO will make monthly fixed prospective payments to providers regardless of how many claims they submit.

11. Will the year-end reconciliation process to compute the actual cost of care utilize data from FFS claims, zero-based claims and WHPP claims amount or will the calculation be a sum of FFS payments and monthly (adjusted and reconciled) net AIPBP payments?
The Actual Total Cost of Care will be calculated using the sum of FFS payments on behalf of attributed members and the sum of adjusted and reconciled fixed prospective payments (the net AIPBP minus admin and PCCM fee).
12. If the latter, will DHVA perform an analysis of actual cost of care for attributed population based only on claims data (actual and estimated)?
DVHA intends to utilize the WHPP amounts captured for the zero-paid claims in order to understand what would have been spent on services for attributed members absent the prospective payment to the ACO. The total WHPP amount will be compared to the total amount prospectively paid during the year. The WHPP amounts will also be considered in setting ACO rates in future years (i.e. trending forward CY 2017 expenditure to set rates for CY 2019).
13. Sec. 7.0 of the contract (attachment A), states that VCCI will no longer be engaged in care management for the ACO-attributed Medicaid population. Please provide the number of Medicaid members that were receiving care management from VCCI and now have care management assigned to OneCare.
63 Medicaid members who were being case-managed by VCCI at the start of the contract period are now in the process of being transitioned to OneCare for management going forward. The VCCI and OneCare teams have been coordinating to ensure an individualized approach and a 'warm hand-off' for each member. It is expected that this process will be ongoing for the next several weeks.
14. Explain if or how Blueprint activities and Patient-Centered Medical Homes (PCMH) are integrated into this contractual arrangement:
The Blueprint and PCMH activities are not integrated in the contract. The ACO and Blueprint collaborate presently, as they have during the multi-payer shared savings programs during the past several years. Until the ACO has more people enrolled, the Blueprint will likely continue to serve state government to facilitate and encourage practice transformation across the whole population rather than solely the ACO program attributed lives. This is consistent with Blueprint's traditional role focusing on multi-payer health care reform.
- a. For instance, will OneCare's network of primary care providers continue working on Blueprint initiatives? If so, is the cost of this work included in the amount of the contract?
Yes, we anticipate OneCare's network will continue to work on Blueprint initiatives. The ACO contract does not contain terms that would definitively

change the relationship between providers and the Blueprint. Furthermore, the cost of Blueprint related activities is not included in the contract amount.

- b. Do cost savings from those activities and support networks accrue to OneCare, and will they no longer be considered in Blueprint's ROI?

DVHA's goal is to understand savings and ROI related to the ACO and Blueprint separately to judge each program on its actual performance.

- c. Will OneCare's primary care providers receive the PCCM payment that is part of the net AIPBP?

Yes, OneCare primary care providers will continue to receive the PCCM payment. This is a pass-through payment that does not affect the calculation of the AIPBP.

- 15. The sections in Attachment B related to payment for services (D) and distribution of the AIPBP (E) break the DVHA payments into two parts: (1) a monthly "net AIPBP" payment to OCVT that includes covered services billed by ACO-contracted providers, which in total accounts for 64% of the expected total cost of care for the attributed members; and (2) fee-for-service payments paid directly to providers for claims submitted to DVHA, estimated at 36% of the expected total cost of care.

- a. Please confirm that the maximum amount of the contract includes both the net AIPBP payments made directly to OneCare and the FFS payments made by DVHA directly to providers (both affiliated and non-affiliated) for attributed members.

Yes, the maximum contract amount includes both the Net AIPBP payments to OneCare and the FFS payments made by DVHA for attributed members. The maximum contract amount was calculated by assuming all attributed members would have the weighted average Total Cap payment made on their behalf for each of the months of the year:

$\$267.32 \text{ PMPM} * 29,103 \text{ members} * 12 \text{ months} = \$93,357,767.52$

- b. How are the prospective payments to OneCare distributed to providers, and does DVHA have authority to review these distributions?

Please see attached 'Exhibit 1' documents (accompanying the OneCare Provider Base Agreement and Medicaid Addendum) for each of the 4 hospitals that will be receiving prospective payments from OneCare. These describe the mechanism by which prospective payments will be made per each hospital's contract with OneCare. DVHA has the authority to audit actual payments throughout the program year.

- c. If DVHA has the authority to review OneCare's distributions to providers, please describe how DVHA has executed, or plans to execute, this authority.

DVHA plans to exercise its authority to review OneCare's distributions to providers; the approach for doing so is under development.

16. Did OneCare provide primary care physicians with the option of participating in the capitation payment rather than FFS payment? (This was a recommendation of the ACO Payment Subcommittee, convened by GMCB in 2015 and on which OneCare was represented).

OneCare provided the prospective payment option at the organizational (or Tax Identification Number) level, but not at the individual provider level. In the 2017 program year, the four participating hospitals (and any hospital-owned practices under their TINs) elected to be paid prospectively; other participating practices (including independent practices and FQHCs) elected to continue being reimbursed FFS.

17. Under Sec. 10.7, OneCare must “participate in data sharing agreements with any health information technology entity required by DVHA.” The contract does not specify the VHIE, so please provide any documents that explain the current and prospective HIT arrangement.

DVHA has not exercised its authority under this section of the contract. DVHA is generally aware that the ACO has a contractual relationship with VITL, which manages the VHIE.

18. In the presentation given to House Health Care Committee on Wednesday (2/15), DVHA’s share of expenditures over/under 3% of TCOC is shown as zero. However, the contract states that if actual TCOC is between 97% and 100% of expected total TCOC, “OneCare will be entitled to receive from DVHA all savings associated with [those] costs” (p. 83). Please explain.

Slide seven of the presentation to the House Health Care Committee attempts to provide policymakers a simple visual illustration of how a 3% upside/downside risk corridor works. The graphic means to convey that between 97% and 103% of expected total cost of care OneCare is at risk to either earn savings or pay for excess spending. DVHA is not at risk for these payments between 97% and 100%; rather, it is fully obligated to pay for these payments.

The graphic was designed as a prompt for testimony and subsequent committee discussion. The accompanying testimony made the following contract terms clear:

- OneCare is entitled to receive from DVHA all savings between 97% and 100% of the total cost of care;
- OneCare is obligated to pay DVHA all costs between 100% and 103% of the total cost of care
- DVHA shall recoup from OneCare any savings where costs fell below 97% of the total cost of care
- DVHA is entitled to pay all costs in excess of 103% of the total cost of care.

The risk arrangement issue can be difficult to explain. DVHA would gladly discuss with your office ways to make the presentation and related concepts more clear.

Request for Information—DVHA

1. A searchable copy of contract #32318
Please see attached searchable contract.

2. A breakdown of attributed members in each MEG

| MEG (as of 01/01/17) | Number (%) of Attributed Members |
|--|---|
| Aged, Blind, or Disabled (ABD) Adult & Child | 1,910 (6.56%) |
| Consolidated Adult | 12,988 (44.63%) |
| Consolidated Child | 14,205 (48.81%) |
| Total | 29,103 |

3. The trend factors applied to each MEG for calculation of the ETCOC and any explanatory documents
Please see attached actuarial report (p. 17, *D. Trends*, and p. 36, *Appendix B.3 – Capitation Rate Development (Final AIPBP)*) for detail on the trend factors applied and a description of the approach used to derive the trend factors.

4. The total number of OneCare providers and how many of those are primary care providers

| Participating Provider Specialty (as of 01/01/17) | Number (%) of Providers |
|--|--------------------------------|
| Primary Care | 678 (36.93%) |
| Specialist eligible for Attribution | 128 (6.97%) |
| Specialist not eligible for Attribution | 1,030 (56.10 %) |
| Total | 1,836 |

5. The total number of attributed Medicaid members and how many of those are attributed to primary care providers

| Attributing Provider Specialty (as of 01/01/17) | Number (%) of Attributed Members |
|--|---|
| Primary Care | 28,580 (98.20%) |
| Specialist | 523 (1.80%) |
| Total | 29,103 |

6. A copy of OCVT’s network contracts (where contracts are duplicative, one copy will suffice, and attachments with standard language are unnecessary)

Please see attached OneCare Provider Base Agreement and Medicaid Addendum.

7. A copy of the Readiness Review report cited in Attachment B, Sec D.4

Please see attached Readiness Review Report.

8. Sec. 1.2.1 of the SOW states that “the AYs used for the PY are the time periods representing State Fiscal Years 2014 and 2015”; however, the table just below that statement shows the corresponding AYs to be FY 15 & 16. Which is correct?
The table is correct; the sentence excerpted above should read “State Fiscal Years 2015 and 2016.”
- a. If FY2014-15 data were used, please explain why more recent data were not chosen for attribution, especially given the distortions due to delayed redeterminations.
Data from SFY 2015-16 were used.
 - b. Did DVHA’s actuary estimate the total cost of care if the attributed population was based on FY2016? If so, please provide.
The TCOC estimates were based on CY 2015 (the most recent full calendar year of data) and were trended forward to 2017. Please see attached actuarial report for additional detail.
9. Sec. 10 appears to provide a process for monthly adjustment of PMPM payments based on current Medicaid status. Is this correct and does the adjustment include all three components of the net AIPBP monthly payment? Does the Medicaid ACO PMPM File contain only active members?
Yes, PMPM payments are adjusted monthly based on Medicaid eligibility for the prospectively attributed Medicaid members. This applies to all three components of the net AIPBP monthly payment—if a member is ineligible for attribution during a given month, no prospective payments will be made on behalf of that member. The Medicaid ACO PMPM file contains the full list of members each month, but indicates when no payment has been made for a member (because of Medicaid ineligibility, evidence of other insurance coverage, or death) for that month.
10. Sec. 10.2.2 states that DVHA’s fiscal agent will continue to receive all claims from VT Medicaid providers and that all claims will continue to be processed through DVHA’s edits and audits. However, 10.4.6 refers to a ACO non-claims response file containing payments to providers not reported at a claim level. Please explain.
Providers are required to submit claims as they have previously, and DVHA’s fiscal agent will continue to process those as they have previously. However, claims for providers electing to receive a prospective payment from the ACO will be zero-paid by DVHA’s fiscal agent upon processing. Through the ‘ACO Non-Claims Response File’, the ACO will detail payments that it makes to any providers being paid prospectively. It is expected that the ACO will make monthly fixed prospective payments to providers regardless of how many claims they submit.

11. Will the year-end reconciliation process to compute the actual cost of care utilize data from FFS claims, zero-based claims and WHPP claims amount or will the calculation be a sum of FFS payments and monthly (adjusted and reconciled) net AIPBP payments?
The Actual Total Cost of Care will be calculated using the sum of FFS payments on behalf of attributed members and the sum of adjusted and reconciled fixed prospective payments (the net AIPBP minus admin and PCCM fee).
12. If the latter, will DHVA perform an analysis of actual cost of care for attributed population based only on claims data (actual and estimated)?
DVHA intends to utilize the WHPP amounts captured for the zero-paid claims in order to understand what would have been spent on services for attributed members absent the prospective payment to the ACO. The total WHPP amount will be compared to the total amount prospectively paid during the year. The WHPP amounts will also be considered in setting ACO rates in future years (i.e. trending forward CY 2017 expenditure to set rates for CY 2019).
13. Sec. 7.0 of the contract (attachment A), states that VCCI will no longer be engaged in care management for the ACO-attributed Medicaid population. Please provide the number of Medicaid members that were receiving care management from VCCI and now have care management assigned to OneCare.
63 Medicaid members who were being case-managed by VCCI at the start of the contract period are now in the process of being transitioned to OneCare for management going forward. The VCCI and OneCare teams have been coordinating to ensure an individualized approach and a 'warm hand-off' for each member. It is expected that this process will be ongoing for the next several weeks.
14. Explain if or how Blueprint activities and Patient-Centered Medical Homes (PCMH) are integrated into this contractual arrangement:
The Blueprint and PCMH activities are not integrated in the contract. The ACO and Blueprint collaborate presently, as they have during the multi-payer shared savings programs during the past several years. Until the ACO has more people enrolled, the Blueprint will likely continue to serve state government to facilitate and encourage practice transformation across the whole population rather than solely the ACO program attributed lives. This is consistent with Blueprint's traditional role focusing on multi-payer health care reform.
- a. For instance, will OneCare's network of primary care providers continue working on Blueprint initiatives? If so, is the cost of this work included in the amount of the contract?
Yes, we anticipate OneCare's network will continue to work on Blueprint initiatives. The ACO contract does not contain terms that would definitively

change the relationship between providers and the Blueprint. Furthermore, the cost of Blueprint related activities is not included in the contract amount.

- b. Do cost savings from those activities and support networks accrue to OneCare, and will they no longer be considered in Blueprint's ROI?

DVHA's goal is to understand savings and ROI related to the ACO and Blueprint separately to judge each program on its actual performance.

- c. Will OneCare's primary care providers receive the PCCM payment that is part of the net AIPBP?

Yes, OneCare primary care providers will continue to receive the PCCM payment. This is a pass-through payment that does not affect the calculation of the AIPBP.

- 15. The sections in Attachment B related to payment for services (D) and distribution of the AIPBP (E) break the DVHA payments into two parts: (1) a monthly "net AIPBP" payment to OCVT that includes covered services billed by ACO-contracted providers, which in total accounts for 64% of the expected total cost of care for the attributed members; and (2) fee-for-service payments paid directly to providers for claims submitted to DVHA, estimated at 36% of the expected total cost of care.

- a. Please confirm that the maximum amount of the contract includes both the net AIPBP payments made directly to OneCare and the FFS payments made by DVHA directly to providers (both affiliated and non-affiliated) for attributed members.

Yes, the maximum contract amount includes both the Net AIPBP payments to OneCare and the FFS payments made by DVHA for attributed members. The maximum contract amount was calculated by assuming all attributed members would have the weighted average Total Cap payment made on their behalf for each of the months of the year:

$\$267.32 \text{ PMPM} * 29,103 \text{ members} * 12 \text{ months} = \$93,357,767.52$

- b. How are the prospective payments to OneCare distributed to providers, and does DVHA have authority to review these distributions?

Please see attached 'Exhibit 1' documents (accompanying the OneCare Provider Base Agreement and Medicaid Addendum) for each of the 4 hospitals that will be receiving prospective payments from OneCare. These describe the mechanism by which prospective payments will be made per each hospital's contract with OneCare. DVHA has the authority to audit actual payments throughout the program year.

- c. If DVHA has the authority to review OneCare's distributions to providers, please describe how DVHA has executed, or plans to execute, this authority.

DVHA plans to exercise its authority to review OneCare's distributions to providers; the approach for doing so is under development.

16. Did OneCare provide primary care physicians with the option of participating in the capitation payment rather than FFS payment? (This was a recommendation of the ACO Payment Subcommittee, convened by GMCB in 2015 and on which OneCare was represented).

OneCare provided the prospective payment option at the organizational (or Tax Identification Number) level, but not at the individual provider level. In the 2017 program year, the four participating hospitals (and any hospital-owned practices under their TINs) elected to be paid prospectively; other participating practices (including independent practices and FQHCs) elected to continue being reimbursed FFS.

17. Under Sec. 10.7, OneCare must “participate in data sharing agreements with any health information technology entity required by DVHA.” The contract does not specify the VHIE, so please provide any documents that explain the current and prospective HIT arrangement.

DVHA has not exercised its authority under this section of the contract. DVHA is generally aware that the ACO has a contractual relationship with VITL, which manages the VHIE.

18. In the presentation given to House Health Care Committee on Wednesday (2/15), DVHA’s share of expenditures over/under 3% of TCOC is shown as zero. However, the contract states that if actual TCOC is between 97% and 100% of expected total TCOC, “OneCare will be entitled to receive from DVHA all savings associated with [those] costs” (p. 83). Please explain.

Slide seven of the presentation to the House Health Care Committee attempts to provide policymakers a simple visual illustration of how a 3% upside/downside risk corridor works. The graphic means to convey that between 97% and 103% of expected total cost of care OneCare is at risk to either earn savings or pay for excess spending. DVHA is not at risk for these payments between 97% and 100%; rather, it is fully obligated to pay for these payments.

The graphic was designed as a prompt for testimony and subsequent committee discussion. The accompanying testimony made the following contract terms clear:

- OneCare is entitled to receive from DVHA all savings between 97% and 100% of the total cost of care;
- OneCare is obligated to pay DVHA all costs between 100% and 103% of the total cost of care
- DVHA shall recoup from OneCare any savings where costs fell below 97% of the total cost of care
- DVHA is entitled to pay all costs in excess of 103% of the total cost of care.

The risk arrangement issue can be difficult to explain. DVHA would gladly discuss with your office ways to make the presentation and related concepts more clear.