



Vermont Program for Quality in Health Care, Inc.

**To: House Committee on Health Care**

**From: Hillary Wolfley, MSPH, Executive Director ([hillaryw@vpqhc.org](mailto:hillaryw@vpqhc.org))**

**RE: S.126**

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## Introduction

Thank you for the opportunity to submit feedback on S.126. The Vermont Program for Quality in Health Care, Inc. (VPQHC) is a 501(c)(3) nonprofit, established in 1988 and designated by the Vermont Legislature as an independent peer review committee. Since 1995, VPQHC has been Vermont's statewide quality organization, focused on improving health care quality. We submit our comments with the understanding that quality, alongside access and cost, is essential to the health care system and must be integrated and supported in health care reform. We appreciate the committee's efforts in advancing healthcare reform and recognize its importance. Our recommendations focus on ensuring quality is effectively incorporated while enhancing the Health Care Delivery Plan's clarity, effectiveness, and long-term impact on Vermont's health care system.

We have organized our feedback by section, outlining the rationale for each suggested language change and providing recommended wording for consideration. Additionally, we have included concluding remarks.

## Feedback by Section

### **Sec. 4 18 V.S.A § 9454. BUDGET REVIEW**

**(e)(1):** VPQHC supports this language and welcomes the opportunity to collaborate with GMCB on quality measures and the hospital budget review process. A strength-based approach that aligns proposed activities with existing efforts is essential to minimizing duplication and leveraging existing expertise across the system.

### **Sec. 8. 18 V.S.A. § 9403 (b) § 9403. STATEWIDE HEALTH CARE DELIVERY PLAN**

**General:** VPQHC is encouraged to see quality at the table for these conversations—it's essential to any system redesign. We support the bill's emphasis on cross-sector collaboration to develop and monitor the plan, creating space to align efforts, share challenges and successes, and work toward common goals. To be effective, the process must be well-managed, inclusive, and focused on impact. VPQHC is well-positioned to support plan development in an advisory capacity, offering deep quality improvement expertise, strong cross-sector relationships, and a trusted, neutral role. As an independent organization focused on healthcare quality, we can help ensure the plan is data-informed, actionable, and aligned with existing efforts to reduce duplication and drive improvement.



Vermont Program for Quality in Health Care, Inc.

**Rationale:** Reframing the Plan as the "Statewide Health Care Delivery **Strategic** Plan" could emphasize its role as an actionable roadmap. Clear expectations for structure and implementation can enhance effectiveness. Evaluating ROI, planning processes, and outcomes ensures accountability, transparency, and resource efficiency. Beyond access gaps and financial sustainability, the Plan could also address system-wide quality improvement, supporting evidence-based decisions and enhancing patient care across Vermont.

**Suggested Language for Consideration:**

- **Define a shared vision, goals, and objectives to improve access, quality, efficiency, and affordability, including benchmarks for assessing progress.**
- **Establish performance metrics and accountability measures to track system-wide progress, promote transparency, and support continuous improvement.**
- **Provide a phased implementation timeline with milestones and regular reporting to ensure adaptability and course correction as needs evolve.**
- **Identify the resources, infrastructure, and support needed to achieve established targets, ensuring feasibility and sustainability of implementation.**
- **Incorporate an evaluation framework within the Results-Based Accountability approach to assess both the effectiveness of the planning process and its overall impact. The evaluation should include:**
  - **What and how much was accomplished?**
  - **How well was it executed?**
  - **Who is better off?**

(b) The Plan Shall (6) Identify:

- **Opportunities to improve the quality of care across the delivery system.**
- **Enhancements in quality reporting and data collection to provide a more accurate and real-time picture of the quality of health care delivery across Vermont.**
- **Systems to ensure that reported data is shared with and accessible to those providing care, enabling them to track performance and inform improvement efforts.**
- **Exemplars of quality care to drive best practice dissemination and strengthen Vermont's learning health system.**

(b) The Plan Shall (6) Identify:

- (A) gaps in access to care, as well as circumstances in which service closures or consolidations could result in improvements in **or negatively impact** quality, access, and affordability



Vermont Program for Quality in Health Care, Inc.

### **§ 9403a. HEALTH CARE DELIVERY ADVISORY COMMITTEE**

**Rationale:** As a contributor to the Plan's development, VPQHC is recommending slight language adjustments in that section, and recommends including its Executive Director (or designee) on the Health Care Delivery Advisory Committee. With VPQHC's expertise in health care quality and performance measurement, this representation would ensure a strong focus on quality in the Plan's development and implementation, as well as contribute to the advisory committee's monitoring and evaluation efforts.

#### **Suggested Language for Consideration:**

(3) collaborate with the Green Mountain Care Board, the Agency of Human Services, the Department of Financial Regulation, **the Vermont Program for Quality in Health Care, Inc.**, and other interested stakeholders in the development and maintenance of the Statewide Healthcare Delivery Plan developed pursuant to section 94023 of this title;

(b)(1) The Advisory Committee shall be composed of the following **15 members:**

**(N) The Executive Director of the Vermont Program for Quality in Health Care or designee.**

### **Sec. 10 § 9353. INTEGRATION OF HEALTH CARE DATA**

**General:** VPQHC consistently seeks opportunities to access high-quality, well-governed data that can inform our quality improvement and patient safety efforts—particularly when it does not impose additional administrative burden on healthcare partners. Access to such data allows us to assess performance, identify high performers and areas for improvement, and share best practices across the system. It also supports partners in understanding their performance relative to peers and using data in meaningful, actionable ways. Advancing quality and patient safety not only improves outcomes but also helps reduce costs across the system. VPQHC has also been in discussion with AHS about joining the HIE Steering Committee to help guide this work.

### **Sec. 12: RETAINING ACCOUNTABLE CARE ORGANIZATION CAPABILITIES; GREEN MOUNTAIN CARE BOARD; BLUEPRINT FOR HEALTH; REPORT**

**General:** VPQHC is interested in discussions about the retention of ACO capabilities—particularly those related to quality measurement, reporting, and improvement activities, with a focus on hospital settings. VPQHC brings deep expertise in aligning data collection, reporting structures, and quality initiatives, and could serve as a valuable partner in sustaining and building upon this work. The current language lacks provisions for collaborative partnerships, so we recommend including requirements that ensure an inclusive process drawing on the experience of organizations already engaged in these efforts.



Vermont Program for Quality in Health Care, Inc.

### **Suggested Language for Consideration:**

The Agency of Human Services, **in collaboration with interested stakeholders**, shall explore opportunities to retain capabilities developed by or on behalf of a certified accountable care organization that were funded in whole or in part using State or federal monies, or both, and that have the potential to make beneficial contributions to Vermont's health care system, such as capabilities related to comprehensive payment reform and quality data measurement and reporting. On or before November 1, 2025, the Agency of Human Services shall report its findings and recommendations to the Health Reform Oversight Committee.

### **Sec. 18. APPROPRIATIONS**

VPQHC would require additional resources to effectively engage in this work.

## **Conclusion**

Thank you again for considering VPQHC's feedback on the draft bill. Our recommendations focus on:

- ✓ Clear goals and measurable outcomes to track progress and effectiveness.
- ✓ A structured evaluation framework to assess the impact of investment in planning.
- ✓ Improved quality measurement and best practices sharing to foster a learning health system.
- ✓ Inclusive stakeholder engagement, incorporating VPQHC's expertise in quality reporting and system improvement and experience in engaging systems of care across the healthcare continuum in Vermont.

Please feel free to reach out if you would like to discuss further. Hillary Wolfley ([hillaryw@vpqhc.org](mailto:hillaryw@vpqhc.org)).