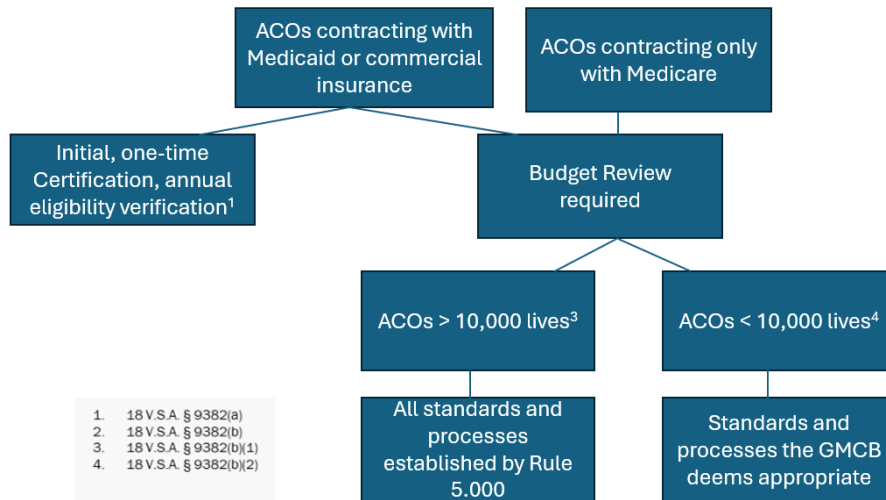


Crosswalk of Proposed Future of Regulation of Accountable Care Organizations in Vermont

Current Statute	Proposed Future Statute
CERTIFICATION	
<ul style="list-style-type: none"> All ACOs contracting with Vermont Medicaid and/or private Vermont payers are subject to a one-time certification process, annual certification eligibility verification in the following years, and can be de-certified at any time Medicare-only ACOs (ACOs that contract with Medicare only) are not currently subject to certification 	<ul style="list-style-type: none"> All ACOs, regardless of contracted payers, are subject to a one-time certification process, annual certification eligibility verification in the following years, and can be de-certified at any time
BUDGET REVIEW	
<ul style="list-style-type: none"> All ACOs, regardless of contracted payers, are subject to an annual budget review process 	<ul style="list-style-type: none"> All ACOs contracting with Vermont Medicaid and/or private Vermont payers are subject to an annual budget review process Medicare-Only ACOs would not be subject to a budget review
SIZE/SCOPE of ACOs	
<ul style="list-style-type: none"> ACOs with 10,000 or more Vermont lives are subject to a budget review against the full set of statutory criteria, while ACOs with fewer than 10,000 lives may have their budgets reviewed under a selected subset of criteria depending on the type and nature of the ACO. 	<ul style="list-style-type: none"> Number of lives is irrelevant to the applied certification and budget review criteria GMCB would have authority to implement expedited certification rules for Medicare-Only ACOs due to some oversight from CMS; a subset of criteria may be applied
ACO REVIEW	
<ul style="list-style-type: none"> For FY25 the GMCB anticipates reviewed the budgets of four ACOs and verified the eligibility of certification for one ACO 	<ul style="list-style-type: none"> If the proposed statute were currently in place, the GMCB be certifying three ACOs (should no further change in ACOs in Vermont occur for 2026)
STATUTORY LANGUAGE	
<ul style="list-style-type: none"> Statutory language informing the GMCB's budget review process and certification requirements for ACOs includes All-Payer ACO Model-specific requirements to ensure the alignment of regulation and model goals 	<ul style="list-style-type: none"> Granular APM-specific language has been removed from the statute and replaced with more general language intended to be agnostic to Vermont's next health care reform efforts

Current Statute



Proposed Future Statute

