



OneCare Vermont Accountable Care Organization Board of Managers Resolution Invoking Participation Waiver for Alcohol Use Disorder Treatment with Peer Recovery Services June 18, 2024

WHEREAS, OneCare participates in the Vermont All Payer ACO Model Vermont Medicare ACO Initiative and the Vermont Medicaid Next Generation Program. The Secretary of the Department of Health and Human Services by and through CMS, and the Department of Vermont Health Access, have provided certain waivers of federal and state fraud and abuse laws in connection with the Vermont All Payer ACO Model (“APM”), the Fraud and Abuse Waiver Notice for Vermont ACO Initiative;

WHEREAS, the waivers are intended to provide OneCare with flexibility to create arrangements that increase success in value-based care and that might not be permitted under the current federal and state health care regulatory schemes or that might be easier to accomplish without some of the strict requirements of those regulatory schemes; and

WHEREAS, there is a relatively high incidence of alcohol use disorder in Vermont and a relatively high failure rate of treatment in the current system of care, for example in Bennington County; and

WHEREAS, increasing access to effective alcohol use disorder treatment is a goal of the All Payer Model and one which OneCare also pursues; and

WHEREAS, the involvement of peer recovery resources throughout the treatment path, from identification through inpatient detoxification to rehabilitation or recovery program and back to the community would likely enhance the success of treatment, but portions of those services are not performed for lack of funding (not reimbursable from insurance); and

WHEREAS, Southwestern Vermont Medical Center and Turning Point Center of Bennington wish to establish an alcohol use disorder care path for Turning Point to provide recovery services such as coaches, counseling and general wellness services to alcohol use disorder patients throughout the treatment process for alcohol use disorder; and

WHEREAS, The Participation waivers are available when, among other things, the governing body of the ACO has reviewed and determined that the arrangements are reasonably related to ACO Activities. ACO Activities include:

- Promoting accountability for quality of care;
- Promoting accountability for cost of care;
- Promoting accountability for overall care;
- Managing and coordinating care;
- Encouraging infrastructure investment;



- Encouraging investment in re-designed care processes for high quality and efficient services delivery;
- Carrying out any obligation or duty under the Vermont ACO Initiative or the Vermont Medicaid NextGen Program (together “Programs”);
- Direct patient care;
- Promoting evidence-based medicine;
- Promoting patient engagement;
- Reporting on quality and cost measures;
- Coordinating care with telehealth, remote monitoring and other technologies;
- Establishing and improving ACO clinical systems;
- Establishing and improving ACO administrative systems;
- Meeting Programs quality standards;
- Evaluating patient health;
- Communicating clinical knowledge;
- Communicating evidence-based medicine; and
- Developing standards for patient access and communication including to medical records.

BE IT RESOLVED by the Board of Managers (the “Board”) of OneCare Vermont Accountable Care Organization, LLC (“OneCare”) as follows:

The OneCare Board of Managers has duly authorized the arrangement below and made a bona fide determination the arrangement is reasonably related to one or more of the above ACO Activities, including managing and coordinating care, accountability for quality, cost and overall care and encouraging investment in re-designed care processes for high quality and efficient service delivery. The Board wishes to extend the protections afforded under the ACO Participation Waiver to the arrangement described below.

1. Southern Vermont Medical Center (SVMC), a Participant, will, in partnership with Turning Point Center of Benington, a peer recovery organization, develop and implement an alcohol use disorder treatment path that includes peer recovery services from identification of treatment needs through inpatient detoxification, post inpatient care at residential or recovery settings, and in the community. Turning Point will provide staff recovery coaches, counselling and general wellness and will be paid by SVMC for those services. More specifically, services include encouraging medically appropriate detoxification, access to peer coaches and counselors for inpatients and after inpatient care, encouraging use of residential or recovery services after discharge. Turning Point will also provide 20 hours weekly of an employee who will coordinate staff needs, support programming and work on reporting. The parties intend to collaborate with the Blueprint for Health, rehabilitation providers and mental health agencies.

OneCare has contributed funding of \$20,000 of the total budget for this project with SVMC funding the remainder. Budget monies will be used to pay Turning Point for the contracted services.

2. The invocation of this Participation Waiver does not, in any respect, indicate that the arrangement is not compliant with applicable regulations.