



# OneCare Vermont Accountable Care Organization Board of Managers Resolution Invoking Participation Waiver for Funded AI Scribe for CPR Practices

August 8, 2025

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, and the OneCare Medicaid contract;

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, OneCare has set the use of Fraud and Abuse Waivers to promote healthcare delivery system innovation as a strategic goal that will further the core activities of the ACO and further performance on established metrics for measuring quality, cost of care and access to care; and

WHEREAS, the Board of Managers has set aside funding for the use of Fraud and Abuse Waivers to promote performance on priority quality measures and delivery system goals, and awarded funding to the above project that will involve a Participation Waiver; 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 that 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 project is also related to the Board's strategic direction to support independent primary care practices during the final programmatic year and to provide tools that can be used in the future, as well as the approval of the allocation of \$200,000 in the 2025 budget to support independent primary care. The Board wishes to extend the protections afforded under the ACO Participation Waiver to the arrangement described below for the reasons stated below.

1. OneCare solicited information from the independent primary care providers in its network about their use of AI Scribe products and experiences with each option. Many practitioners tried several available AI Scribe options with a preference for OneCare to provide a product that was interoperable with practice's electronic health records. However, there were few EHR compatible options and most that were tried did not meet practitioners' needs or expectations.
2. AI Scribe products generally require a 12-month subscription to secure favorable pricing terms.
3. The 22 OneCare enrolled practitioners in Evergreen Family Health, a CPR practice, will receive 12 months of Sunu, the AI Scribe product that is integrated into their electronic health record, eClinicalWorks. The practice has used this product and is satisfied with it.
4. The practitioners in the following CPR practices will receive 12 months of Heidi Health's AI Scribe product: Lakeside Pediatrics, Mountain View Natural Medicine, Thomas Chittenden Health Center, Richmond Family Practice and White River Family Practice. Several practices have tried this product and are very satisfied with its performance.
5. The practitioners in Primary Care Health Partners, another CPR practice, will receive 12 months of their preferred AI Scribe product, either Heidi Health or Abridge. The practice is currently in a trial period with Heidi Health's product.
6. After providing AI Scribe to these CPR practices, the remaining budget will be used to provide Heidi Health's AI Scribe product to as many independent primary care providers as possible.
7. Leadership will report back to the Board with a final report on the distribution of the allocated funds for the Board's approval.