

SECTION	SUBSECTION	COMMENTS	MEMBERS	RESPONSE
<b>GENERAL COMMENTS</b>	N/A	Manual is too long and dense, and sometimes repetitive. Consider moving sections into appendices and using bullet points instead of paragraphs to make the material more digestible.	Bob Krzys Jennifer Herz Mary Bradley	We are making the following changes to shorten the manual: 1) Separating it into two versions: one for self-insured employers and one for fully-insured employers 2) Making the following sections appendices: -Recommendation Development -Consumer Engagement Strategies -"Overcoming Obstacles" chart – to be replaced by FAQs in the body of the document -Aligning with Provider-side Reforms 3) Condensing the following sections: -Executive Summary and Introduction to V-BID -Communicating V-BID Benefits to Employees
		Include a two-pager on marketing that communicates a) the basic concept and opportunity and b) contains the essential information you need to present V-BID as a viable plan option to senior management.	Jennifer Herz	We are currently developing this. This marketing piece will also serve as a recruitment tool for the Learning Collaborative.
		Compile information about actual employers' outcomes with V-BID to build a business case for adopting V-BID plans. Include info about near-term and long-term costs of V-BID.	Jennifer Herz Bob Krzys	We are adding call out boxes/side bars to various sections of the manual highlighting V-BID employer success stories and the outcomes they have achieved.
		Some page references may be off.	Jennifer Herz	Final versions of the Manual will have accurate page references.
		Address employee privacy concerns with employers accessing their health information	Jennifer Herz	This will be addressed in Overcoming Obstacles and Communication Strategies sections.
		<b>EXECUTIVE SUMMARY</b>	N/A	Shorten the summary. The goal should be to grab readers' attention quickly and to let them know what's "in it" for them. Using just the last paragraph and expanding it a little would be a sufficient introduction.
Remove sections on the background and process of developing the recommendations or move them to an appendix	Mary Bradley Jennifer Herz			These will be removed and included in the appendix on Recommendation Development.

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<b>V-BID BENEFITS TO EMPLOYERS</b>	N/A	Add piece on “how employees appreciate employer’s investment in their health and that it’s not just about bottom line, but also makes the company a good place to work”	Mary Bradley	The following subsection has been added: “Increase Employee Satisfaction V-BID plans focus on getting patients the most effective care at the right time to improve their health and prevent future health risks and complications. Knowing that their employer is investing in their health, rather than just worrying about their bottom line, helps employees feel supported by company leadership and may increase employee satisfaction. For example, one large employer has noted that its employees consistently report that the company supports employees’ health and well-being and that this is a top performance driver.”
		Lead with bottom line to employers and follow with the softer V-BID benefits. Be cognizant of language choices, as employers already pay for a large portion of employee premiums and often have health savings arrangements and this is asking for employers to pay more up-front.	Jennifer Herz	The bottom line benefit of V-BID plans is that the employer gets more health for their dollar, i.e. employees are using the right services for them at the right time. While the evidence around V-BID plans resulting in net savings is inconclusive, healthcare dollars are spent more efficiently, and employers may see reduced costs in the long-term. This section will be re-organized to sell the point that employers will get more for their money, and then focus on improved employee health and reduced spending for employees.
		Section lacks discussion of “experience rating for the self-insured and how V-BID may have the opportunity to bend that curve”.	Jennifer Herz	Evidence for V-BID reducing net costs is inconclusive. While V-BID may ultimately present an opportunity for long-term savings, we cannot guarantee this.
		Include information on the history of premium increases and any success stories of self-insured employers who have adopted V-BID and have been able to change their trajectory.	Jennifer Herz	See above comment. We are looking into success stories of employers being able to reduce premiums as a result of V-BID, but most likely do not have this evidence.
		In the second paragraph under “Improve Health and Productivity of Employees” change ‘improved profits’ to ‘improved performance’.	Jennifer Herz	Change made.

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<b>HOW TO USE THIS MANUAL</b>	Intro	“The Connecticut State Innovation Model V-BID Initiative recognizes... <u>as well as the interests of employees.</u> ”	Steven Wolfson	Change made.
	V-BID Templates	Limit the Manual to self-insured audience. There is concern that the fully-insured template is not ready for distribution.	Jennifer Herz	We are separating the manual into two versions, one for self-insured employers and one for fully-insured employers. The fully-insured manual will continue to be developed as we receive input from the health plans and fully-insured employers.
<b>V-BID GUIDING PRINCIPLES</b>	List item #7	Include an explanation in the manual that the concept of high value provider is being constructed by the overall Health Innovation Steering Committee and they are considering specific detailed criteria for identifying a high value provider. Include this criteria and highlight the consumer centric criteria for the Advanced Patient Center Medical Homes physicians. Need to explain to employers that accelerating VBID uptake needs insurers and providers to really engage consumers in the delivery of care in addition to VBID 1.0 methods of plan redesign.	Bob Krzys	The final Manual will include the SIM Quality Council Provisional Measure Set as an Appendix, as well a short Appendix on consumer centric principals. The Resources section will contain a link to the Advanced Patient Centered Medical Homes Standards. We will include the Advanced Patient Center Medical Homes Standards.
<b>V-BID BASIC TEMPLATE</b>	V-BID Structures	As there is discussion relating to access to claims and personal health information, reference compliance with HIPAA Privacy Act.	Mary Ellen Breault	Reference has been incorporated.
		Disagrees with the caveat on HSA plans and preventative services. Agrees that the Manual should advise employers to seek legal counsel, but should endorse preventative care and medications that are allowed outside of the deductible.	Mary Bradley	Changed language to: “*For HSA-HDHPs: According to IRS guidance, coverage does not include ‘any service or benefit intended to treat an existing illness, injury, or condition, including drugs or medications’ until the deductible is met. Employers should consult their legal counsel and/or health plan on approaches that incentivize drugs and services based on a member’s clinical condition. Employers are encouraged to work with their health plan on excluding any preventive services and medications that are allowable under IRS guidance from the deductible.”

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		<i>Please note:</i> When offering V-BID benefits, plans are still required to remain in compliance with <u>state and federal laws and regulations, including regarding</u> mental health parity <u>regulations</u> and health plan nondiscrimination <u>laws</u> .	Mary Ellen Breault	Changes made.
	V-BID Component 1	The ACA mandates certain preventative services and screenings to be covered at no cost to the patient that are already covered by almost all plans. Clarify that the Manual is asking employers to provide incentives for these services so that employees utilize them.	Jennifer Herz	The first bullet of the implementation guidance for this recommendation clarifies this point.
<b>V-BID EXPANDED TEMPLATE</b>	V-BID Component 2: Justification	Point about increasing medication adherence is important. Concerned it will be overlooked as last bullet in this section.	Jennifer Herz	Point has been moved to the second bullet.
	Additional Component 2 Supplemental Benefit Examples	Unclear if third bullet is telemedicine, could use further review for plain language.	Jennifer Herz	Language changed to: "Telemedicine, including virtual or audio consultations with healthcare providers"
	Additional Component 2 DM Examples	Will specific guidance or examples of alternatives for outcomes based approaches be provided?	Jennifer Herz	The law does not provide examples of what alternatives may be offered. We have added a link to the regulations that require this for employers to seek further guidance as needed.
	Examples of employers implementing Component 2	Suggest adding how much was spent on the programs. Who utilized the United Healthcare plan?	Jennifer Herz	We do not have specific data on how much was spent on these programs, the sources only report cost savings. United Healthcare language changed to "Eliminated payments...for United Healthcare employees."
<b>V-BID IMPLEMENTATION STEPS</b>	Communications Plan	Employee communication... <u>are is</u> key to the success of any V-BID plan design.	Steven Wolfson	Change made.
	Choose a V-BID Template	Unclear what is meant by an HSA-HDHP plan needing approval by their legal team	Jennifer Herz	HSA/HDHPs will need legal consultation on approaches that exclude condition-specific services from the deductible due to IRS guidance limiting this. This language is included in templates but sentence has been removed, as only one template will be included in each manual.

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	N/A	Suggest emphasizing the role of TPAs in planning and implementing V-BID	Jennifer Herz	Will modify each step to include the role of the TPA and the role of the employer.
<b>BEST PRACTICES AND LESSONS LEARNED</b>	Make Services convenient for employees	This recommendation is very problematic because it seems to suggest “fragmentation of care by encouraging employers to set up some services ‘on site’ or through ‘pharmacy clinics’.” V-BID should encourage care through the PCP or usual source of care. At the very least, there needs to be a mechanism in which the records are sent promptly to the PCP.	Steven Wolfson	The following language has been added: “If services are offered on-site or at nearby clinics, the employer should develop a mechanism to efficiently send records of these services to the patient’s PCP or usual source of care for the purpose of care coordination.”
<b>CONSUMER ENGAGEMENT STRATEGIES</b>	3 <sup>rd</sup> paragraph	Unsure about some of the examples provided.	Jennifer Herz	This section has been condensed and made into an appendix. The examples provided are examples of wellness programs that employers have incentivized, i.e. providing free gym memberships to employees.
<b>OVERCOMING OBSTACLES</b>	Practice Barrier	The following sentence is unclear: “Requires defining and standardizing what is meant by ‘high-value’ despite that there is a lack of evidence of the clinical and cost effectiveness of many services and providers”	Steven Wolfson	Language changed to: “V-BID requires defining and standardizing what is meant by “high-value”, yet there is a lack evidence of the clinical and cost effectiveness of many services and providers.”
	Administrative Barrier	Format the chart title for “Administrative” barriers to read on one line of text	Steven Wolfson	This is due to a Word version issue – the final Manual will be PDF, which will address these issues.
	Ethics Barrier	Ethics box should be called “legal”	Jennifer Herz	Change made.
	N/A	Overall, section could be more directed.	Jennifer Herz	This section has been converted into FAQs, with the most pertinent barriers and solutions highlighted. The full chart is now an appendix.
		It is unclear why there is a focus on employers working with actuaries – the role of the TPA should be included.	Jennifer Herz	Changed actuary references to employer’s TPA or health plan administrator. The TPA may engage their own actuaries for some of these decisions.
		Need more of a focus on employee fears of employers accessing their health information.	Jennifer Herz	FAQ added: “How do I address employee concerns about the company accessing their health information?”
		Add a box about the time commitment needed to institute change.	Jennifer Herz	Added to “Cultural” Barrier: “Getting employee buy-in and changing employee culture is challenging and takes too much time”

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				Strategy: “While it may take time to change employee culture, employers can begin communicating about V-BID benefits while still in the planning phases, which allows employees to adjust to the changes while the employer has time to work out the details.”
<b>ALIGNING WITH PROVIDER-SIDE REFORMS</b>	Chart	Concern with providers delivering disease management programs as part of pay for performance. Doubtful that physicians want to take on the extra record keeping that the health plans do when they deliver disease management services.	Mary Bradley	Removed this line from the chart.
<b>COMMUNICATING TO EMPLOYEES</b>	Best Practices	Why would an employee be concerned that higher quality services will cost more?	Jennifer Herz	This concern was raised by some employees in a survey referenced in a V-BID implementation guide but has been replaced by “Educate employees on how their health plan can...reduce their out of pocket spending, provide higher quality services at lower costs...”
		Suggest adding that communication from employee leaders is also important, as sometimes messages are more effective coming from peers. Clarify if communications would come from the employer or the insurer.	Jennifer Herz	This section has been condensed and reorganized to focus on the most important best practices. New subsection “Who should communicate” addresses that communications should come from both employers and health plans, and that employers should use company leadership and employee leaders to deliver messages.
		“Honoring” employer’s commitment to confidentiality is not the appropriate word.	Jennifer Herz	Language changed to: “Highlight the employer’s commitment to keeping employee health information confidential”.
<b>RESOURCES</b>	Sample Communications Materials	Need explanation as to how draft materials were developed	Jennifer Herz	Language added: “These sample materials are based on examples of current marketing materials used by health insurers offering V-BID plans, strategies suggested in interviews and surveys by employers currently implementing V-BID, and best practices described in the literature on V-BID implementation.”