

Proposed Achievement Scoring Mechanism

New: The parties proposed a scoring system in the initial application designed to measure the continuing public advantage of the Cooperative Agreement, along with proposed accountability mechanisms. What follows is a modification of that proposal for consideration.

We propose that each commitment can be categorized into one of three groups: Protection, Conduct, and Investment Commitments. The suggested categorization of each commitment is listed below:

Protection Commitments	Conduct Commitments	Investment Commitments
1,2,3,4,5,6,7,8,9,10,20,21,22,23,24,29,32	11,12,13,14,15,16,28,30,31,33	17,18,19,25,26,27

Protection Commitments

Protection Commitments are designed specifically to mitigate any negative effects of the reduction of competition and provide assurances of access to services. Because each Protection Commitment is of significant importance to the fundamental goal of protecting payers, providers, and consumers, each must be fully met and attested to in each Annual Report filed with the state.

During an annual review process by the Commissioner and conveyance of a credible report to the New Health System to be audited as required in the regulations, the Commissioner may determine that a Protection Commitment is not being fulfilled and require an immediate corrective action plan from the New Health System and set forth a period of time for correction of not less than 90 days. If an acceptable plan is not submitted or corrective action is unsuccessful, the Commissioner may, at the Commissioner's discretion, compel immediate resolution under the procedure defined in regulation (see VA Code XXXX.XXXXX) or negotiate with the parties to determine effective remediation or additional corrective action steps.

Conduct and Investment Commitments

Conduct and Investment Commitments provide significant public advantage above and beyond the fundamental goal of protecting payers, providers, and consumers and will be evaluated collectively each year to ensure that commitments are being achieved as determined by an Overall Progress Score under the Cooperative Agreement..

Conduct Commitments are agreements made between the Authority and the Parties which govern the actions of the New Health System. These commitments will be evaluated on a "Satisfied" (Score 100) or "Not Satisfied" (Score 0) scale. Each Conduct Commitment will be assigned a weight of 2% of the overall Cooperative Agreement Score. For any Conduct Commitment not achieved, the Commissioner may require a corrective action plan to ensure compliance.

Investment Commitments require significant implementation resources, timelines for achievement or both. It is proposed that progress for Investment Commitments be measured by introducing a scoring methodology adopted from the Association of State and Territorial Health Officials *National Public Health Performance Standards (NPHPS)*. Concurrent with the development of each implementation plan outlined for the Investment Commitments a questionnaire would be developed as part of the annual

Proposed Achievement Scoring Mechanism

reporting process. For each Investment Commitment, evaluation questions would be agreed upon by both the parties and the state. Each of these questions would have equal weight in scoring that commitment. Each question would then be graded according to the NPHPS categories:

No Performance: 0% or absolutely no activity. Score 0.

Minimal Performance: Greater than zero, but no more than the 25% of the activity described within the question is met. Score 25.

Moderate Performance: Greater than 25%, but no more than 50% of the activity described within the question is met. Score 50.

Significant Performance: Greater than 50%, but no more than 75% of the activity described within the question is met. Score 75.

Optimal Performance: Greater than 75% of the activity described within the question is met. Score 100.

Each individual Investment Commitment will receive a score between 0 and 100 based on the average of all questions scored within that commitment. The score will be multiplied against the suggested weight of each investment (derived relative to investment size) in the table below and the weighted scores will be totaled.

Investment Commitment	Commitment Weight
17. Expand GME and Training	10%
18. Grow Research	10%
19. Adopt a Common Clinical IT Platform	25%
26. Improve Community Health	10%
27. Enhance Health Care Services	25%

For Investment Commitments that achieve any score less than Moderate Activity, the Commissioner may require a corrective action plan to ensure compliance and also require that any investment less than that agreed to in the annual plan be fulfilled in the subsequent year or that the plan be adjusted in agreement with the state to ensure ongoing benefit.

Example Overall Progress Scoring:

Conduct Commitments (Maximum Score of 20)

9 Conduct Commitments are satisfied. $100 \times 9 \times 2\% = 18$

1 Conduct Commitment is Not Satisfied. $0 \times 1 \times 2\% = 0$

Subtotal: $18 + 0 = 18$ **Conduct Commitment Points**

Investment Commitments (Maximum Score of 80)

Eight of eight questions for Commitment #17 are Optimal. $(8 \times 100) / 8 = 100$ Unweighted Score

Proposed Achievement Scoring Mechanism

Unweighted Score multiplied by weight: $100 \times 10\% = 10$ Weighted Points

Six of six questions for Commitment #18 are Optimal. $(6 \times 100)/6 = 100$ Unweighted Score

Unweighted Score multiplied by weight: $100 \times 10\% = 10$ Weighted Points

Four of six questions within Commitment #19 are Optimal and two are Significant $(4 \times 100)/6 + (2 \times 75)/6 = 91.7$ Unweighted Score

Unweighted Score multiplied by weight: $91.7 \times 25\% = 22.9$ Weighted Points

Six of six questions for Commitment #26 are Optimal. $(6 \times 100)/6 = 100$ Unweighted Score

Unweighted Score multiplied by weight: $100 \times 10\% = 10$ Weighted Points

Four of six questions within Commitment #27 are Optimal and two are at No Activity $(4 \times 100)/6 + (2 \times 0)/6 = 66.7$ Unweighted Score

Unweighted Score multiplied by weight: $66.7 \times 25\% = 16.7$ Weighted Points

Subtotal: $10.0 + 10.0 + 22.9 + 10.0 + 16.7 = 69.6$ **Investment Commitment Points.**

Overall Progress Score

Conduct Commitment + Investment Commitment Points = $18 + 69.6 = 87.6$ **Overall Progress Score**

Continuing Public Advantage Score

Continuing Public Advantage cannot be achieved in a given evaluation year without fulfillment of all Protection Commitments and an Overall Progress Score of at least 60.

Continuing Public Advantage can be achieved during a particular year if individual Conduct or Investment Commitments receive a corrective action plan. However, failure to achieve success with corrective action plans within twelve months of enactment may result in the state compelling immediate resolution under the procedure defined in regulation (see VA Code XXXX.XXXXX).