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Agency of Human Services

VERMONT Blueprint for Health

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Christina Borden, PCMH CCE
Director, Recognition Programs Policy & Resources
1100 13th St. NW
Floor 3
Washington, DC 20005

RE: Extension to NCQA Engagement and Renewal Recognition Timelines

March 31, 2020

Dear Ms. Borden,

A novel coronavirus and its associated illness, COVID-19, have resulted in the disruption of primary care services in Vermont. Family medicine and internal medicine practices, pediatric practices and naturopathic practices are upending the ways they provide primary care and redesigning their practice workflows in order to respond to the pandemic. Many practices have moved to telehealth and telephonic visits for a majority of visits and some are holding in-person interactions in parking lots and patient vehicles. To minimize virus spread, practices have implemented changes to patient visits including assigning staff to meet patients at locked doors, guide them to appropriate rooms designated for sick or healthy patients and sanitize rooms between visits. They have created entirely new patient and staff protection protocols, supply management systems, and have had to reprioritize provider time. Furthermore, as public health officials are predicting a surge in COVID-19 cases and as new information about the virus continues to emerge many of these protocols are likely to change again. Primary care practices are the access point to the health care system for many Vermonters.

Governor Scott has declared a State of Emergency in Vermont by Executive Order and has issued a series of addendums to that Order closing all schools and directing the closure of in-person operations for all non-essential businesses. The Order and addendums can be found at:

https://governor.vermont.gov/document-types/executive-orders

For all practical purposes, the provision of primary care as practices knew it ended on March 1, 2020. Since that date, practice staff have been impacted by the Governor's emergency orders to stay home and work remotely if possible; social distancing; the closure of schools and day care centers; and other impacts of the pandemic. Practices have been unable to allocate clinician and staff time to NCQA documentation and reporting and/or quality improvement initiatives unrelated to the pandemic.

The Department of Health Access, which houses the Blueprint, is developing emergency funding relief to help insure the solvency of our primary care practices. We are directing as many resources (human and financial) to support core primary care operations focusing on health care and community safety.

The Blueprint for Health is suspending the patient-centered medical home requirement for practices' participation in the Blueprint for Health healthcare reform initiative for the duration of the State of Emergency. Participating

practices will continue to receive monetary support for advanced primary care services based on their current NCQA recognition.

Due to this unprecedented interruption of the provision of health care, Vermont primary care practices do not have the capacity at this time to address the administrative activities of NCQA PCMH Recognition.

In order to reduce non-essential, administrative activities for all Vermont Blueprint for Health NCQA recognized and engaging practices we are requesting extensions of NCQA Recognition and timeframes in which practices are expected to submit documentation to NCQA as part of the recognition, renewal or sustaining processes. **The Vermont Blueprint for Health is attesting on the behalf of all Vermont practices that circumstances related to COVID-19 interfere with meeting recognition requirements.**

These impacts are likely to continue for some time into the future. Unfortunately, no one knows when the pandemic will have subsided enough for people to go back to work, for schools and day care centers to reopen, for primary care practices to return to normal operations.

We request that the extension begin March 1, 2020 and continue for the timeframes outlined below.

- Extensions for new practices or those in the **Engagement** process:

  Due date is deemed to be **9 months from the date that Governor Scott's Emergency Executive Order is completely lifted.** (This would give practices a good portion of the current time allotted to obtain recognition: 3 months to get health care back to normal, 6 months to complete the Engagement process).

- Extensions for **Sustaining** practices submitting Annual Recognition documentation:

  Due date is deemed to be **6 months from the date that Governor Scott's Emergency Executive Order is completely lifted.** (3 months to get health care back to normal, 3 months to complete the Annual Reporting process.), or their current expiration date, whichever is later.

Our central office team looks forward to working with NCQA to operationalizing this extension and we are committed to assisting in any way that reduces administrative inconvenience to NCQA operations.

On behalf of all Vermont's PCMH practices thank-you for your support of this extension.

Sincerely,

Beth Tanzman, MSW
Executive Director, Vermont Blueprint for Health

Cc: Cory Gustafson, Commissioner Department of Vermont Health Access