



Equity and Practice Transformation (EPT) Payment Program
Value-Based Payment Milestone
Rubric

Instructions

Using the [EPT deliverable portal](#), practices will complete the Value-Based Pay Capability Assessment tool, use those results to inform a gap analysis, and develop an action plan based on three areas identified by the practice for VBP capability building.

EPT Milestone Description: Conduct an assessment of value-based payment (VBP) readiness, identify gaps, and develop an action plan to improve readiness for VBP. The VaPCAT is the first component of the EPT VBP milestone; EPT practices will also submit the VBP deliverables template which includes gap analysis and action plan. The VBP milestone can be submitted in May or November 2026.

A. Value-Based Payment Capability Assessment Tool (VaPCAT)

EPT practices complete the VaPCAT and use the results to complete the remainder of the VBP deliverable template. The VaPCAT is accessible [here](#) and should be completed in the EPT Deliverable Portal.

Response Criteria:

- Completed Value-Based Payment Capability Assessment Tool (VaPCAT).

Accepted:

All questions in the VaPCAT have complete responses.

Not Accepted:

Any question that has not been responded to will result in a “Not Accepted.”

B. Gap Analysis to Identify Areas of Improvement

Practices should complete the gap analysis chart to identify gaps in VBP capabilities and identify three areas for capability building.

Response Criteria:

- Complete a VBP Gap Analysis across the five VaPCAT domains, including:
 - Current State:



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- Briefly describe the current state at your EPT practice (e.g., what you do now in the VBP domain).
- VBP Domain Maturity:
 - On a 0 – 5 scale (scale definition in deliverable template), use VaPCAT results to reflect the degree to which capabilities are in place at your practice across each domain (whether built internally or provided via partner organization).
- Capability Gaps/Weaknesses:
 - The most significant gaps in each domain in your practice.
- Priority for Action:
 - Your practice’s priority for building capabilities in each domain using a low/medium/high scale (scale definition in deliverable template).
- Rationale: Describe the reasons for your high, medium or low priority rating.
- Identification of three capabilities that the practice will focus on to improve readiness for VBP

Accepted:

All elements of the VBP Gap Analysis chart have been addressed. The response should include a clear and concise summary of existing capabilities across each domain (if there are no capabilities in place across the domain or if a practice believes the capability doesn’t apply to them, the response should clearly state this), a rating for the maturity of capabilities across each domain (using the scale provided), a list of capability gaps, how the practice prioritizes addressing those gaps (using the scale provided), and a rationale for the priority rating.

Not Accepted:

Any question that has not been responded to will result in a “Not Accepted.” If the current state doesn’t describe existing capabilities based on the VaPCAT or only lists “not applicable,” the response will not be accepted. If at least one capability gap isn’t listed for 4 of the 5 domain areas, the response will not be accepted. If fewer than three capabilities are identified for improvement, the response will not be accepted.

C. Develop an Action Plan



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Response Criteria:

- Practices summarize the process the practice used to develop the action plan, including:
 - A brief overview of activities and approach
 - The leadership and staff involved in the discussions
 - How this aligns with other priorities in the practice

- Practices complete an action plan with the following components:
 - Major Activities:
 - A minimum of 3 steps to build, refine or contract for this capability. For each activity, indicate the month/year you expect to complete the activity.
 - Key Decisions:
 - Description of at least two key decisions you expect your practice will need to make to make progress on your improvement opportunity (e.g., building internally vs. working with a partner; allocating reserve funds; defining performance benchmarks).
 - Structural Changes:
 - Description of at least one structural change you expect you'll need to make (e.g., governance, staffing, contracting, workflow redesign).
 - Staffing:
 - List of staff managing this process and list of other staff involved in the process.
 - Leadership Engagement:
 - Description of activities to engage leadership and what's needed from leadership in order to be successful.
 - Measuring Progress:
 - For each improvement opportunity, at least one specific and measurable indicator of progress.

- Practices describe the two mostly likely implementation risks they expect to encounter them; at least one mitigation strategy for each risk is provided.



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Accepted:

The practice describes the process for developing the action plan, including (1) activities and approach, (2) leadership and staff involved in the planning, and (3) how the action plan aligns with other strategic priorities within the practice. All 7 elements of the action plan are completed for each of the improvement opportunities identified in the gap analysis. Practices should also describe at least two likely implementation risks, a description of why these are likely to be encountered, and at least one mitigation strategy for each risk.

Not accepted:

If a practice doesn't describe their planning process (approach, leadership and staff involved in discussions, and alignment with other practice priorities), the response will not be accepted. If there is not currently alignment with existing practice priorities, the response should indicate this or it will not be accepted. If at least three major activities to build, refine or contract for each capability aren't described, the response will not be accepted. If at least two (of three) major activities in the timeline don't include a month/year for expected completion, the response will not be accepted. If at least 2 key decisions aren't provided, the response will not be accepted. If at least one structural change isn't identified, the response will not be accepted. If the response does not include at least one specific indicator to assess progress, the response will not be accepted. If the response doesn't include at least one implementation risk, one reason why the practice expects to encounter the implementation risk, and at least one mitigation strategy, the response will not be accepted.