



State of Vermont  
Agency of Human Services  
208 Hurricane Lane, Suite 103  
Williston, VT 05495

---

# Global Commitment Register

January 11, 2016

---

GCR 16-001  
FINAL

## **Medicaid Reasonable Opportunity Period**

### **Policy Summary:**

Vermont Medicaid is changing the reasonable opportunity period (ROP) for verifications.. The ROP is changing from a 90 day period to a 10 day period for renewals. For new applications, the ROP will be 20 total days communicated in 2 periods of 10 days. These changes restore the reasonable opportunity period for verifications for applicants and enrollees to what was in effect prior to the implementation of the Affordable Care Act. This policy change, including the public input process, is being done through emergency rulemaking (see Additional Information below) with a Bulletin Number of 16-04.

### **Effective Date:**

January 11, 2016

### **Authority/Legal Basis:**

42 CFR § 435.912 Timely determination of eligibility  
Act 58 of 2015 Sec. E.306.1 Emergency Rulemaking Authority  
3 V.S.A. § 844 Emergency rules

### **Population Affected:**

All Medicaid applicants and beneficiaries.

### **Fiscal Impact:**

No fiscal impact.

### **Additional information:**

Bulletin No. 16-04, which includes the adopted ROP rule, background on the change, and information on the public input process, will be posted here when available:

<http://dcf.vermont.gov/esd/laws-rules/proposed-adopted>.

Vermont Secretary of State website on Administrative Procedures Act (APA) rulemaking:

<https://www.sec.state.vt.us/administrative-rules.aspx>.

Vermont statutes on emergency rulemaking:

<http://legislature.vermont.gov/statutes/section/03/025/00844>.