

State of Vermont
Department of Vermont Health Access
280 State Drive, NOB 1 South
Waterbury, VT 05671-1010
<http://dvha.vermont.gov>

[Phone] 802-879-5900

Agency of Human Services

December 29, 2022

Sarah deLone, Director
Children and Adults Health Programs Group
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850

RE: 1902(e)(14)(A) Waiver Authority for PHE Unwind

Dear Ms. deLone:

Upon the end of the Public Health Emergency, Vermont will have a large volume of eligibility and enrollment actions to complete. Vermont anticipates severe operational and systems challenges in the timely completion of these eligibility and enrollment actions in large part due to an unprecedented caseload of renewals that the state will need to process, coupled with significant staffing shortages that the state currently faces.

The March 3, 2022 Centers for Medicare & Medicaid Services (CMS) State Health Official (SHO) letter #22-001, *“Promoting Continuity of Coverage and Distributing Eligibility and Enrollment Workload in Medicaid, the Children’s Health Insurance Program (CHIP), and Basic Health Program (BHP) Upon Conclusion of the COVID-19 Public Health Emergency,”* describes strategies states may request to assist in addressing the challenges states may face as part of a transition to routine operations. CMS can authorize these strategies under Section 1902(e)(14)(A) of the Social Security Act (“1902(e)(14)(A) strategies”).

During this transition period, Vermont is requesting that CMS approve the 1902(e)(14)(A) strategy outlined below to promote access to care for Medicaid applicants and reduce state administrative burden:

Enroll Individuals Based on SNAP Eligibility (Targeted SNAP Strategy)

Vermont requests to temporarily enroll in Medicaid at application individuals who are receiving benefits under the Supplemental Nutritional Assistance Program (SNAP), despite the differences in household composition and income-counting rules. Under this authority, Vermont seeks to enroll in Medicaid SNAP participants whose gross income as determined by SNAP is under the applicable MAGI threshold for Medicaid eligibility without conducting a separate MAGI-based



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income redetermination. In order to enroll individuals into Medicaid at application under this strategy, Vermont will continue to collect and verify additional eligibility information, such as citizenship and immigration, required to complete the Medicaid enrollment.

This authority is needed to help address the extraordinarily high volume of renewals and other eligibility and enrollment actions that Vermont will need to conduct during the unwinding period. It will efficiently facilitate the initial application process by limiting the need for requests for additional information from Vermont's Medicaid applicants thereby promoting access to care, continuity of coverage, minimizing burden and reducing workload for Vermont's eligibility staff during a time that the state is facing significant strains on its workforce, including staff shortages.

Vermont requests that this authority be effective as of the start date of its unwinding period and remain effective through the end of the unwinding period, as defined in SHO #22-001.

Vermont looks forward to your review and approval of this request. If you have any questions or concerns, please contact Danielle Fuoco, Policy Analyst, (802) 585-4265, Danielle.Fuoco@vermont.gov

Sincerely,



Adaline Strumolo
Deputy Commissioner
Department of Vermont Health Access

