



Children and Adults Health Programs Group

April 14, 2023

Adaline Strumolo
Deputy Commissioner
Department of Vermont Health Access
280 State Drive, NOB 1 South
Waterbury, VT 05671-1010

Dear Ms. Strumolo:

This letter is in response to Vermont's request, dated April 10, 2023, for a waiver under section 1902(e)(14)(A) of the Social Security Act (the Act), that will protect beneficiaries in addressing the challenges the state faces as part of a transition to routine operations when the continuous enrollment condition ends. Section 1902(e)(14)(A) allows for waivers "as are necessary to ensure that states establish income and eligibility determination systems that protect beneficiaries." Such waivers are time-limited and are meant to promote enrollment and retention of eligible individuals by easing the administrative burden states may experience in light of systems limitations and challenges.

The ongoing COVID-19 pandemic and implementation of federal policies to address the PHE have disrupted routine Medicaid and Children's Health Insurance Program (CHIP) eligibility and enrollment operations. Medicaid and CHIP enrollment has grown to historic levels due in large part to the continuous enrollment requirements that states implemented as a condition of receiving a temporary 6.2 percentage point federal medical assistance percentage increase under section 6008 of the Families First Coronavirus Response Act (P.L. 116-127).

Consistent with 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,*" Vermont has requested that CMS provide authority under section 1902(e)(14)(A) of the Act to temporarily permit the state to accept updated in-state beneficiary contact information from the U.S. Postal Services (USPS) National Change of Address (NCOA) without additional confirmation from the individual. The state has expressed the need for this authority in order to address systems and operational issues related to managing staff workload during the unwinding period. Specifically, the state cited that this flexibility will assist the state to efficiently facilitate the renewal process by limiting the need for requests for additional information from Vermont's Medicaid beneficiaries thereby promoting 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. Given that the lack of current beneficiary addresses would significantly undermine the state's ability to successfully renew eligible beneficiaries, this authority will protect beneficiaries in the aggregate by reducing the risk of procedural terminations for many beneficiaries.

Under Section 1902(e)(14)(A) of the Act, your request to update in-state beneficiary contact information based on the USPS NCOA database is approved, as described and subject to the conditions below.

Using the U.S. Postal Service (USPS) National Change of Address (NCOA) to Update Beneficiary Contact Information

The authority provided in accordance with this letter will enable the state, during the period of time specified below, to accept updated in-state contact information received from NCOA without additional confirmation from the individual. Under this authority, the state will treat updated in-state contact information received from NCOA as reliable and will update the beneficiary's case record with the new contact information without first sending a notice to the beneficiary address on file with the state in order to provide them with the opportunity to dispute the address change. The authority provided in accordance with this letter does not apply to out-of-state addresses received from NCOA. The authority provided in accordance with this letter applies to both Medicaid and CHIP populations within the state.

In exercising the authority provided in this letter, the state will ensure that it will only update in-state contact information obtained from the NCOA database that is more recent than the information on file with the state.

The authority provided in this letter is effective May 1, 2023 and will remain effective until 14 months after the end of the continuous enrollment condition (i.e. May 31, 2024).

The authority provided in this letter is subject to CMS receiving your written acknowledgement of this approval and acceptance of this new authority and the terms described herein within 30 days of the date of this letter.

We look forward to our continuing work together as part of a transition to routine operations. If you have questions regarding this award, please contact Joe Weissfeld and Jessika Douglas in the Division of Enrollment Policy and Operations, at josef.weissfeld@cms.hhs.gov and jessika.douglas@cms.hhs.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sarah deLone".

Sarah deLone, Director,
Children and Adults Health Programs Group