

April 10, 2023

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 Unwind

Dear Ms. deLone:

During its unwinding period, 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.

During this transition period, Vermont is requesting that CMS approve the 1902(e)(14)(A) strategy outlined below to protect beneficiaries from inappropriate terminations and reduce state administrative burden:

Partnering with the National Change of Address (NCOA) Database to Update Beneficiary Contact Information

Vermont requests to temporarily permit the acceptance of updated in-state beneficiary contact information from the National Change of Address (NCOA) database without additional confirmation from the beneficiary when the updated information has no impact on the beneficiary’s Medicaid eligibility. Under this authority, the state would treat updated in-state



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contact information confirmed by and received from the NCOA database as reliable and update the beneficiary record with the new contact information without first sending a notice to the beneficiary address on file with the state.

This request is based on identified operational issues that prevent the state from implementing the policy to first contact the beneficiary to confirm the accuracy of updated in-state contact information received from the NCOA database prior to entering the updated contact information received into its system as the address of record. 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 its unwinding period. It will 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.

In implementing this option, Vermont assures that:

- The beneficiary contact information obtained from the NCOA database is more recent than the information on file with the state

Vermont requests that this authority be effective May 1, 2023 and remain effective through the end of the state's 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

