

**State of Vermont**

**Department of Vermont Health Access**

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*Agency of Human Services*

August 22, 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

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 advises in SHO #22-001 that these strategies are authorized under Section 1902(e)(14)(A) of the Social Security Act and that it will consider other strategies under that section in addition to those described in SHO #22-001.

Vermont is requesting that CMS approve the strategy outlined below as an authorized strategy under Section 1902(e)(14)(A) of the Social Security Act as it will help to protect beneficiaries in Vermont from inappropriate terminations and will reduce Vermont’s administrative burden during this transition period:

***Partnering with the United States Postal Service (USPS) In-State Forwarding Address to Update Beneficiary Contact Information (USPS Contact Updates):***

Vermont requests to temporarily permit the acceptance of updated in-state beneficiary contact information from the United States Postal Service (USPS) in-state forwarding address without additional confirmation from the beneficiary when the forwarding address has no impact on the beneficiary’s Medicaid eligibility. Under this authority, the state would treat updated in-state contact information confirmed by and received from USPS returned mail with a forwarding



address 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 Vermont from implementing the policy to first contact the beneficiary to confirm the accuracy of updated in-state contact information received from USPS in-state forwarding address prior to entering the updated contact information received into its system as the address of record. This authority will help address the extraordinarily high volume of 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.

Vermont requests that this authority apply to both Medicaid and CHIP populations.

In implementing this option, Vermont assures that:

- The beneficiary contact information obtained from USPS in-state forwarding address is more recent than the information on file with the state.

Vermont requests that this authority be effective October 1, 2022 and remain effective until 14 months after the end of the month in which the public health emergency for COVID-19, as declared by the Secretary of Health and Human Services under section 319 of the Public Health Service Act (42 U.S.C. § 247d), ends.

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](mailto:Danielle.Fuoco@vermont.gov)

Sincerely,



Adaline Strumolo  
Deputy Commissioner  
Department of Vermont Health Access