

After discussion with AHS and DAIL, I wanted to reach out to share a concern regarding the revised draft as reviewed on Tuesday, specifically the section on creating a working group to make recommendations for extending moderate needs group services to more Vermonters. The purpose and charge of the working group make good sense. The challenge is with the timing of including the working group's recommendations in the Global Commitment waiver.

Our specific concern is with Section 5 parts (b) and (c). I've pasted the language:

(b) The Department shall collaborate with others in the Agency of Human Services as needed in order to incorporate the working group's recommendations into the Agency's proposals to and negotiations with the Centers for Medicare and Medicaid Services for the next iteration of Vermont's Global Commitment to Health Section 1115 demonstration, so that the extended moderate needs supports can be available to Vermonters beginning on January 1, 2023.

(c) On or before January 15, 2023, the Department shall report to the House Committees on Human Services, on Health Care, and on Appropriations and the Senate Committees on Health and Welfare and on Appropriations regarding the working group's findings and recommendations, including the portions of the recommendations that were incorporated into the new Global Committee demonstration and the amounts of any associated funding needs.

If the intent was to impact the current waiver negotiation meaningfully and have a complete conversation with CMS about changes, then the report would have needed to be completed already or within the next few months. As it stands now, waiver negotiations will be completed before the working group could make any recommendations.

Rather, we would propose a separate and longer timeline for the Moderate Needs Working Group report that would allow for robust stakeholder engagement and would be able to make more thorough, evidence-based recommendations. If the report were due back to the appropriate committees in July 2023, for example, that would allow the group one year to complete its work. Given the scope of the charge, this could be accomplished.

Thank you for considering this request. Please feel free to reach out with any follow up questions.

Best,  
Angela