DEPARTMENT OF HEALTH & HUMAN SERVICES

Program Support Center
Financial Management Service
Division of Cost Allocation

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June 5, 2012

Mr. Douglas Racine
Secretary
State of Vermont
Agency of Human Services
208 Hurricane Lane # 103
Williston, Vermont 05495-2069

Dear Mr. Racine:

This is to advise you of the approval of the revisions to the Vermont Agency of Human Service (AHS) Cost Allocation Plan (CAP), which were submitted under letter dated June 29, 2011. The revisions are to reflect continuous changes within the Agency of Human Services due to a department wide reorganization. These revisions, which were submitted in accordance with 45 CFR 95, Subpart E, are effective April 1, 2011 except as noted below.

This approval shall remain in effect until such time as the basis and methods for allocating costs in the plan becomes outdated due to organizational changes, changes in Federal law or regulations, or there is a significant change in program composition that would affect the validity of approved cost allocation procedures.

The plan is approved and costs claimed in conformance with the plan are subject to the following conditions:

1. The approval is based on information provided by the State and is void if the information is later found to be materially incomplete or inaccurate.

2. The costs claimed for Federal financial participation must be allowable under the law, the cost principles contained in OMB Circular A-87 and program regulation.

3. Department of Children and Family Services (DCF), Division of Family Services, Vision Program Code 40530.7 – Guardianship Assistance Program: DCF has agreed to revise vision program code 40530.7 to read Guardianship Assistance Maintenance Payments. This section of the CAP is effective July 1, 2010 to coincide with the effective date of the State Plan amendment that covers the Guardianship Assistance Program.

4. Vermont Department of Health (VDH) School-Based Medicaid Program Implementation Guide for Statewide Random Moment Time Study (RMTS), VDH RMTS Manual for School-Based Medicaid Administrative Claiming Services, and VDH Claiming Manual for School-Based Medicaid Administrative Services: The Centers for Medicare and Medicaid Services (CMS) has requested additional information from VDH for review. We are deferring approval of the above

mentioned sections, as requested by CMS, until review is conducted and approval is given.

5. Based on CMS letter to Vermont dated May 29, 2007,
   - All current and future PACAP revisions for each AHS Department should comply with Federal regulations regardless of the status of the Global Commitment to Health waiver. The Office of Vermont Health Access administrative expenses and allocation methodologies should comply with Federal regulations at 45 CFR 95.507 (a) and (b) and 42 CFR 433.15.
   - A general reference to the Global Commitment to Health waiver at the beginning of each AHS Department's allocation methodology should be indicated by an asterisk attached to each Plan Department number and allocation methodology that is affected by the waiver.

6. The approved plans are subject to ongoing revisions as the Vermont Agency of Human Services completes the transition to the new organizational and operational structure. These ongoing changes will be addressed in subsequent plan revisions that may impact on currently approved cost allocation methodologies.

Nothing contained herein should be construed as approving activities not otherwise authorized by approved program plans, or Federal legislation or regulations.

The implementation of the cost allocation plan approved by this document may from time to time be revised by authorized Federal staff. The disclosure of inequities during such reviews may necessitate changes to the plan.

Sincerely,

Robert I. Aaronson
Director, Division of
Cost Allocation

cc: Borseti, R., ACF
Johnson, W., CMS
Lubing, L., USDA/FNS

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