



State of Vermont
Agency of Human Services
280 State Drive, Center Building
Waterbury, VT 05671-1000

Global Commitment Register

August 9, 2023

GCR 23-034

Final

Medicaid Investment: Cultural and Linguistic Competence in Developmental Disabilities Services

Policy Summary:

The Vermont Medicaid program established a Medicaid health-related investment for building regional capacity for cultural and linguistic competence in Developmental Disabilities Services overseen by the Vermont Developmental Disabilities Council (VTDDC).

Vermont's population is becoming increasingly diverse. As human services systems become increasingly aware of the health disparities faced by marginalized groups, cultural and linguistic competence has become a national priority – and a matter of law. This program is designed to increase cultural and linguistic competence at the regional level where home- and community-based services (HCBS) are delivered. The VTDDC, in partnership with a consortium of disability organizations, will coordinate a regionally focused training project to increase cultural and linguistic competence in Vermont's Developmental Disabilities Services.

Vermont's Global Commitment to Health Section 1115 Demonstration waiver authorizes expenditures, within annual limits, for public health, health care, and health-related investments. This investment will benefit low-income, uninsured, underinsured individuals and Medicaid beneficiaries in Vermont. This change affords federal matching funds for increasing cultural and linguistic competence in Vermont's Developmental Disabilities Services.

Effective Date:

April 17, 2023 – March 2025

Authority/Legal Basis:

[Global Commitment to Health Waiver](#): Waiver authority #5 [Section 1902(a)(13), 1902(a)(30)]; Special Term and Condition #6.8.

Population Affected:

People receiving Developmental Disabilities Services

Fiscal Impact:

The estimated gross annualized budget impact is \$52,500.

Public Comment Period:

The public comment period ended on April 17, 2023. No comments were received.

To be added to the GCR email list, send an email to AHS.MedicaidPolicy@vermont.gov.

Additional Information:

The new investment template can be found on the following pages.

ATTACHMENT S
New Investment Application Template

For each new investment, the state must submit the following information to CMS as described in STC 11.6.

Date	3/15/23
Investment Title	Building Regional Capacity for Cultural and Linguistic Competence in Developmental Disabilities Services
Estimated Amount	\$52,500
Time Period	March 2023-March 2025
Department	Vermont Developmental Disabilities Council (VTDDC)
Category	Increase the access to quality health care by low income, uninsured, underinsured individuals and Medicaid beneficiaries in Vermont.
Project Objective, Targeted Outcomes, and Impact to Health Equity	
<p>This program is designed to increase cultural and linguistic competence (CLC) at the regional level where home and community-based services (HCBS) are delivered. Vermont's population is becoming increasingly diverse. Greater Burlington now hosts a rich array of New American communities, and census figures show a slow but significant increase in the number of BIPOC Vermonters. Moreover, significantly more Vermonters of color report having a disability than do white Vermonters. As human services systems become increasingly aware of the health disparities faced by marginalized groups, cultural and linguistic competence has become a national priority – and a matter of law. The Vermont Developmental Disabilities Services (DDS) Division System of Care Plan for 2023-25 includes changes that reflect the need for services attuned to the culture of diverse beneficiaries. It is critical that the DDS System embed the values and skills of CLC in its regional partner organizations.</p>	
Project Description	
<p>This must include descriptions of specific terms associated with eligibility, benefits and services, and how the state intends to operationalize the program (e.g., population served, provider types, provider qualifications, methodology for incentive payments)</p>	
<p>The VTDDC, in partnership with a consortium of disability organizations, will coordinate a regionally focused training project to increase CLC in Vermont's Developmental Disabilities Services. Regional teams, centered at Designated and/or Specialized Services Agencies that provide developmental services, will receive awards to plan and implement training and other strategies to increase CLC. This approach reflects the insight that to shift organizational culture, work must take place at the community level and reflect the expressed needs of that local community. VTDDC will provide contract management and project oversight.</p>	
How does the state ensure there is no duplication of federal funding?	
<p>The Agency of Human Services operates under a Cost Allocation Plan (CAP) which is approved quarterly by HHS. The CAP ensures there is no duplication of funding because total expenses are allocated to the benefitting federal program.</p>	
Source of non-federal share	
<p>State funds equivalent to the amount of federal funds attributable to the increased FMAP.</p>	

How does the state ensure that the investment does not include any activities listed in STC 11.6 (Investment Approval Process)?

AHS staff have reviewed project descriptions to ensure that the investment does not include any activities listed in STC #11.5 and will monitor program expenditures to ensure continued compliance with this requirement.

The state assures that in reporting cost, the state and providers must adhere to 45 CFR §75 Uniform Administration Requirements, Cost Principles, and Audit Requirements for Health and Human Services (HHS) Awards and 42 CFR §413 Principles of Reasonable Cost Reimbursement. Pursuant to 45 CFR §75.302(a) the state must have proper fiscal control and accounting procedures in place to permit the tracing of funds to a level of expenditures adequate to establish that such funds have not been used in violation of applicable statutes. Costs must be supported by adequate source documentation.