



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

Global Commitment Register

March 17, 2023

GCR 23-036
PROPOSED

Medicaid Investment: It's Your Right Training Series

Policy Summary:

The Vermont Medicaid program proposes to establish a Medicaid health-related investment for a training series that will strengthen understanding of beneficiary rights and new regulations for self-advocates and their family members, which will be overseen by the Vermont Developmental Disabilities Council (VTDDC).

Home- and community-based services (HCBS) have been stressed by the COVID-19 Public Health Emergency and workforce shortages. These trainings will assist the State in ushering in new federal regulations and operational changes in the system of care. With clear information, beneficiaries and their families can confidently engage with providers and other decision-makers. VTDDC will offer a series of targeted training modules for public guardians, family members, and individuals who utilize HCBS.

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.

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 \$103,435.

Public Comment Period:

March 17, 2023 – April 17, 2023

Send comments to:
Medicaid Policy Unit
280 State Drive, Center Building
Waterbury, VT 05671-1000

Or submit via e-mail to AHS.MedicaidPolicy@vermont.gov.

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	“It’s Your Right!”: A training series about beneficiary rights and procedures that impact the delivery of home and community-based services
Estimated Amount	\$103,435
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>The VTDDC will coordinate and deliver training and plain language materials about beneficiary rights and new regulations for self-advocates and their family members. This initiative is a means of strengthening home and community-based services (HCBS), which have been stressed by the public health emergency and workforce shortages. With clear information, beneficiaries and their families can move from fear and speculation to confidently engaging with providers and other decision-makers. These trainings will assist the State in ushering in new federal regulations and operational changes in the system of care. HCBS regulations ensure an individual's rights of privacy, dignity and respect, and freedom from coercion and restraint. The HCBS regulations outline what providers must do to receive HCBS funding. Beneficiaries and their families need to understand their rights and the quality standards governing providers for the system to provide effective services.</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>VTDDC will offer a series of targeted training modules for public guardians, family members and individuals who utilize HCBS. Topics include the CMS Settings Rule, person-centered planning, filing and appeal or grievance, recognizing and responding to abuse, neglect and exploitation, how agencies reduce the risk of mistreatment, an introduction to the Developmental Services Ombuds Office, and independent case management. Trainings will be offered via on-line trainings, webinars, in-person trainings, plain language booklets, and grants to local self-advocacy groups to create projects that share key information with peers. VTDDC will coordinate subcontracts, convene content development work groups, and ensure audience outreach, project evaluation, and any required reporting.</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
State funds equivalent to the amount of federal funds attributable to the increased FMAP.
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.