



State of Vermont  
Agency of Human Services  
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# Global Commitment Register

January 22, 2024

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GCR 24-002  
FINAL

## **Vermont Medicaid: 12 Months of Continuous Eligibility for Children**

### **Policy Summary:**

The Vermont Medicaid program implemented a 12 month continuous eligibility requirement for children effective January 1, 2024. Vermont Medicaid's Health Benefit Eligibility and Enrollment (HBEE) rule was revised, effective January 1, to include this new requirement. The continuous eligibility requirement is expected to prevent harmful gaps in health care coverage for children.

Section 5112 of the Consolidated Appropriations Act requires all states to implement 12 months of continuous eligibility for children under age 19 who are enrolled in Medicaid. The 12 month continuous eligibility requirement applies to children who are eligible pursuant to the Medicaid state plan or a waiver provided the child has been determined eligible under a Medicaid group described in the Social Security Act at 1902(a)(10)(A). The only Medicaid eligibility groups that are not covered by this new requirement are children enrolled on the basis of (1) Transitional Medical Assistance, or (2) Medically Needy Medicaid. See HBEE 7.03(a)(3)

Continuous eligibility for children means that children will not lose Medicaid coverage between their annual eligibility reviews due to most changes in circumstances. The only circumstances in which continuous eligibility for children may end for a child who has been determined eligible for Medicaid and is enrolled are when (1) the child is no longer a state resident, (2) the child turns 19 years old, (3) the child or their representative requests voluntary termination of eligibility, (4) eligibility was determined to have been erroneously granted based on specified circumstances, and (5) the child is deceased.

### **Effective Date:**

January 1, 2024

### **Authority/Legal Basis:**

Consolidated Appropriations Act of 2023 (Pub. L. No. 117-328)

[Health Benefits Eligibility and Enrollment Rules 7.03\(a\)\(3\) and 8.03\(d\)\(2\)](#)

### **Population Affected:**

Medicaid beneficiaries who are under 19 years old.

**Fiscal Impact:**

The Department of Vermont Health Access does not project a fiscal impact, as the Vermont Medicaid budget already has the impact of this change embedded in it due to the public health emergency suspension of redeterminations resulting in continuous eligibility since 2020.

**Public Comment Period:**

There is no public comment period because this is a mandatory federal requirement.

To be added to the GCR email list, send an email to [AHS.MedicaidPolicy@vermont.gov](mailto:AHS.MedicaidPolicy@vermont.gov).