



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

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# Global Commitment Register

July 3, 2024

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GCR 24-029  
FINAL

## **Change Healthcare Outage—Medicaid Response**

### **Policy Summary:**

The Vermont Medicaid program made changes to support providers impacted by the Change Healthcare cybersecurity incident identified on February 21, 2024. The cybersecurity incident impacted certain Medicaid enrolled providers' ability to process and submit claims for Medicaid services. In response to the outage, Vermont Medicaid authorized the following changes and flexibility on a temporary basis.

**Interim Payments:** Vermont Medicaid made payments to impacted providers based on historical average claims. Effective retroactively to February 21, 2024, and effective through June 30, 2024, pharmacies, and other qualified providers including hospitals, Federally Qualified Health Centers, long term care facilities, primary care providers, chiropractors, physical therapists, dentists, mental health therapists, dermatologists, and other specialty care providers were eligible to receive payments in amounts representative of up to 7 days of claims payments for Medicaid services including, hospital inpatient and outpatient services, primary care and specialty services, pharmacy services, long term care facility services, dental services, behavioral health services, and other professional services that are not otherwise paid as a result of the Change Healthcare cybersecurity incident. The Global Commitment to Health amended State Plan reimbursement page ([Attachment 4.19 Introduction](#)) includes additional information on the payment provisions.

**Copay Temporary Elimination:** Pharmacy copayment requirements were suspended from February 21, 2024 - March 18, 2024 (See [GCR 24-026](#)). This temporary change was submitted to the Centers of Medicare and Medicaid Services as State Plan Amendment (SPA) #24-0008.

**Other Flexibilities:** Vermont Medicaid allowed temporary flexibilities including relaxing prior authorization requirements, bypassing early prescription refill edits for claims processing, and other Drug Utilization review edits. [Pharmacy Programs Bulletins and Advisories](#) describe the temporary flexibilities and can be found on the Vermont Department of Health Access website.

**Effective Date:** February 21, 2024

**Authority/Legal Basis:**  
[Medicaid State Plan](#)

This change is being done through Global Commitment to Health waiver authority, where DVHA may establish rates with providers on an individual or class basis without regard to the rates currently set forth in the approved State Plan.

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

**Population Affected:**

All Medicaid

**Fiscal Impact:**

The estimated gross annualized budget impact for suspending copays is \$100,000. Other changes are expected to be budget neutral.

**Public Comment Period:**

The public comment period ended April 29, 2024. No comments were received.

The following State Plan pages were amended:

- Attachment 4.19 Introduction
- G2c (TN#:24-0008)

Click here for the [Medicaid State Plan](#) on the AHS website.