



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

Global Commitment Register

March 29, 2024

GCR 24-029
PROPOSED

Change Healthcare Outage—Medicaid Response

Policy Summary:

The Vermont Medicaid program is making 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 is making 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 are 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 will be submitted to the Centers of Medicare and Medicaid Services as State Plan Amendment (SPA) #24-0008.

Other Flexibilities: Vermont Medicaid is allowing temporary flexibilities including relaxing prior authorization requirements, bypassing early prescription refill edits for claims processing, and other Drug Utilization review edits until claims processing systems are fully operational. [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:

March 29, 2024 – April 29, 2024

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 draft SPA pages and Global Commitment amended State Plan page provide additional details on the proposed changes; copies of the draft pages can be requested from local Department for Children and Families (DCF) offices or from DVHA at (802) 355-8843, or can be found on the [Agency of Human Services website](#).