



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

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# Global Commitment Register

December 19, 2024

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GCR 24-147  
PROPOSED

## **Change to MAGI-based Financial Eligibility for Current Medicaid Beneficiaries (SPA 25-0002)**

### **Policy Summary:**

The Vermont Medicaid program is submitting a State Plan Amendment (SPA) to the Centers for Medicare and Medicaid Services (CMS) to formalize how financial eligibility is determined for current MAGI-based Medicaid beneficiaries. This SPA has no impact on the methodology used for determining financial eligibility for non-MAGI-based Medicaid beneficiaries (including the methodology that applies to the aged, blind, and disabled).

Under MAGI-based Medicaid methodologies, financial eligibility for new applicants is based on current monthly income and family size. State Medicaid agencies have an option when determining financial eligibility for current beneficiaries. For current beneficiaries, financial eligibility can be based on:

- Current monthly household income and family size, or
- Projected annual household income and family size for the remaining months of the current calendar year.

This SPA reflects Vermont's alignment of its financial eligibility for current Medicaid beneficiaries with that used for new applicants by electing use of current monthly household income and size. This is a change to Vermont's Medicaid State Plan. The current State Plan states that financial eligibility for current MAGI-based Medicaid beneficiaries is based on projected annual household income and family size for the remaining months of the current calendar year.

This SPA will be submitted to CMS as SPA # 25-0002 and applies to the MAGI Based Methodologies section of the Medicaid State Plan.

This change will also be reflected in the following Health Benefits Eligibility and Enrollment (HBEE) rule section in upcoming rulemaking, expected to commence in early 2025:

- HBEE Part 5, Section 28.03(g)(2) – Will be amended to state that current monthly household income and family size will be used when determining financial eligibility for current MAGI-based Medicaid beneficiaries.

### **Effective Date:**

February 1, 2025

**Authority/Legal Basis:**

[Medicaid State Plan](#)

**Population Affected:**

Medicaid beneficiaries whose financial eligibility is determined through MAGI-based methodologies.

**Fiscal Impact:**

The estimated gross annualized budget impact is \$0.

**Public Comment Period:**

December 19, 2024- January 20, 2025

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](mailto:AHS.MedicaidPolicy@vermont.gov).

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

**Additional Information:**

The draft SPA provides additional details on the proposed changes; copies of the draft SPA can be requested from the Department of Vermont Health Access (DVHA) at (802) 355-8843, or can be found on the [Agency of Human Services website](#).