

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard, Mail Stop S2-14-26  
Baltimore, Maryland 21244-1850



## **Disabled & Elderly Health Programs Group**

---

October 29, 2015

Steven Costantino  
Commissioner  
State of Vermont, Department of Vermont Health Access  
312 Hurricane Lane, Suite 201  
Williston, VT 05495

Dear Mr. Costantino,

The Centers for Medicare & Medicaid Services (CMS) received Vermont's Comprehensive Quality Strategy (CQS) on September 8, 2015, along with a revised version with an Appendix B on September 15. The CQS includes Vermont's Statewide Transition Plan (STP) to bring state standards and settings into compliance with new federal home and community-based settings requirements. CMS is conducting a detailed content review of the STP. However, we wanted to provide feedback regarding the public comment process.

Vermont's CQS sets forth a blueprint for assessing quality of care for beneficiaries as well as plans for achieving compliance with the home and community-based settings requirements. CMS found that Vermont has met the requirements regarding electronic and non-electronic notification to the public of the STP. The state held a thirty-day public comment period and summarized the results, and the state's response to comments, as required. However, CMS is concerned that it was difficult for the public to provide meaningful comments on the STP because it was hard to identify specifically those sections of the CQS that addressed the home and community-based settings requirements. We note this concern was also reflected in the stakeholder feedback the state received on its plan.

Following CMS's detailed review of the STP, the state will receive a more in-depth feedback letter. Subsequently, as the state makes revisions to the STP based on that feedback, CMS requests the state clearly identify which sections of the CQS address compliance with each of the home and community-based settings requirements, and repost the plan for an additional public comment period. In addition, it is also important to clarify if Appendix B, submitted on September 15<sup>th</sup>, was added to the STP in response to public input and if that Appendix went through a public input process.

Vermont will have an opportunity to discuss this, and any other issues, in greater detail with CMS after we forward our substantive comments on the STP and schedule a follow-up call. In the interim, please feel free to contact George Failla, the analyst overseeing the review of the Vermont STP for CMS. He can be reached in the CMS Central Office at 410-786-7561 or [George.Failla@cms.hhs.gov](mailto:George.Failla@cms.hhs.gov).

Sincerely,

Ralph F. Lollar, Director  
Division of Long Term Services and Supports

cc: Stephen Mills, Program Branch Manager