



Medicaid and CHIP Operations Group

June 16, 2026

Jill Mazza Olson
Medicaid Director
Agency of Human Services
280 State Drive
Waterbury, VT 05671

RE: Corrective Action Plan (CAP) Completion for HCBS Conflict of Interest

Dear Director Olson:

The Centers for Medicare & Medicaid Services (CMS) has completed its review of the documentation and evidence submitted by the State of Vermont to address federal HCBS conflict-of-interest regulations at 42 CFR 441.730(b), which require the state ensure the independence of entities performing evaluations of eligibility, needs assessments, and person-centered plan development. These issues affected five programs under its Global Commitment to Health Section 1115 demonstration that offer a combination of Home and Community-Based Services (HCBS) and rehabilitation services operated by Vermont's Agency of Human Services. The programs are as follows:

- 1) Choices for Care Program;
- 2) Brain Injury Program;
- 3) Developmental Disabilities Services Program;
- 4) Community Rehabilitation and Treatment Program; and
- 5) Mental Health Under 22 Program.

Since the initiation of the Corrective Action Plan (CAP), Vermont transitioned services provided under the Community Rehabilitation and Treatment (CRT) and Mental Health Under 22 programs to the Medicaid State Plan. Accordingly, these programs are no longer subject to the final implementation of the CAP.

Upon review of the state's submissions, CMS has determined that Vermont has successfully implemented its Conflict-of-Interest CAP, met all associated requirements, and satisfactorily addressed the CAP requirements for all applicable programs.

CMS appreciates the state's efforts to strengthen its conflict-of-interest protections and to ensure that person-centered service planning, case management, and service delivery functions are administered in accordance with federal requirements.

The state remains responsible for maintaining compliance with all applicable federal requirements and for continuing to monitor and oversee implementation of its conflict-of-interest

policies and procedures. CMS may review these requirements through future waiver actions, operational reviews, monitoring activities, audits, or other oversight processes, as appropriate. CMS will continue to provide technical assistance as needed to your state regarding the required federal waiver assurances.

If you have any questions concerning this information, please contact me at (410) 786-7561. You may also contact Mansi Shukla at mansi.shukla@cms.hhs.gov or (410) 786-3574.

Sincerely,

George P. Failla, Jr., Director
Division of HCBS Operations and Oversight

cc: Mansi Shukla, CMS
Ciera Lucas, CMS
Rabia Khan, CMS
Patricia McKnight, CMS
Cynthia Nanes, CMS
Eli Greenfield, CMS
Curtis Cunningham, CMS