

S.245 - DVHA Response, concerns re provider-based billing

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Hello Rep. Lippert and Rep. Donahue,

Requested during Commissioner Costantino's testimony on S.245 on April 15th were any thoughts or concerns with the possibility of an amendment that prevented or prohibited provider-based billing. DVHA's concern with an amendment of this nature is how the state would respond if CMS mandated a type of provider-based billing for a specific service or procedure that is not yet envisioned. This is a hypothetical situation, with unknown timelines, but DVHA would be placed in a challenging situation if state law prohibited compliance with a federal mandate, and DVHA were required to request permission from the VT legislature before working with the federal government on such change. An amendment to S.245 may need to be crafted to avoid such a scenario.

Thank you,
Lindsay

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