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February 21, 2024

House Committee on Health Care  
Vermont State House  
115 State Street  
Montpelier, VT 05633-5301

**Re: H.622 and Reimbursement of Certain EMS Transportation Services**

Dear Chair Houghton and Committee Members:

On behalf of MVP Health Care ("MVP"), below are responses to the Committee questions concerning H.622 and Reimbursement of Certain EMS Transportation Services.

**What is MVP's Reimbursement Policy for "No Transport" Services?**

MVP pays for these services (HCPCS 10998), but does not have a formal payment policy in place. Over the last few years, MVP has worked with some of its EMS providers to develop two reimbursement rates: One for EMS treatment in place, with medication administration, and one without medication administration. For clarification, several EMS providers have approached MVP about this type of reimbursement, and MVP has established payment arrangements for both participating and non-participating providers.

**What is MVP's Reimbursement Policy to Transport to a Non-Hospital Emergency Room?**

MVP does not have a formal EMS reimbursement policy. We assume that "non-hospital emergency room" could mean urgent and other acute care centers. As part of its claims configuration, MVP's systems would flag an EMS claim where drop-off occur at non-hospital settings. When this happens, MVP manually reviews the information to determine medical necessity and location appropriateness. If the claim meets those standards, it is processed as an emergency transport claim – with no differentiation for drop-off site.

**Does MVP Have Any Comments on H.622 Sections 2 & 3?**

MVP has no comments on these Sections.

Sincerely,

A handwritten signature in blue ink that reads "Jordan T. Estey".

Jordan T. Estey  
Senior Director, Government Affairs  
MVP Health Care