

March 19, 2024

Senate Committee on Finance  
Vermont State House  
115 State Street  
Montpelier, VT 05633-5301

**Re: H.861, an act relating to reimbursement parity for health care services delivered in person, by telemedicine, and by audio-only telephone.**

Chair Cummings and Committee Members:

I write on behalf of MVP Health Care ("MVP") concerning H.861, an act relating to reimbursement parity for health care services delivered in person, by telemedicine, and by audio-only telephone.

**Clinical Utility and Value**

MVP opposes H.861 because it would require reimbursement parity for audio-only services without regard to the clinical value of those services. Requiring parity for audio-only services without regard to the clinical value of those services limits health plans' ability to drive care to the most appropriate setting. MVP wants to invest in the services that provide clinical value for consumers, and this statutory mandate would prohibit any such flexibility.

**MVP Payment Policy**

MVP currently reimburses audio-only telephone medical services at 75 percent of the equivalent in-person rate for services. MVP opted to reimburse behavioral health services provided by licensed non-physicians at 100 percent of the in-person rate because:

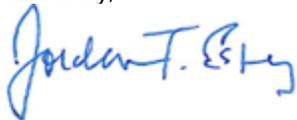
- MVP and our members see clinical value in the delivery of these mental health and substance use disorder treatment services by telephone.
- There is a shortage of behavioral health providers, and our members need these vital services.

MVP is committed to maintaining our current reimbursement policy in 2025, and we urge the Committee to maintain the 75-percent reimbursement rate for medical services required by the Department of Financial Regulation for 2024, and to consider limiting reimbursement parity to non-physician behavioral health services provided by audio-only telephone.

**Questions?**

Thank you for the opportunity to provide comments on H.621. Please contact me with any questions.

Sincerely,



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