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Re: Response to Public Comments for Global Commitment Resister (GCR) [Policy 21-068, Change to Hysterectomy Prior Authorization Requirements](#)

The Department of Vermont Health Access (DVHA) response to public comments on this policy change, as well as a summary of the comments received, is below. The comments received are enclosed in the pages following the response.

Summary of Comments Received:

DVHA received [16 public comments on this proposed policy](#) to remove prior authorizations for hysterectomies not related to gender reaffirming surgeries. DVHA received comments from health care providers, advocacy organizations, and the general public. Commenters expressed support for the proposed change to remove the prior authorization requirement for hysterectomies and further expressed support for removing the prior authorization requirement for all hysterectomies, including those related to gender-affirming surgery.

State Response:

Thank you for your interest and public comments on GCR policy 21-068, Change to Hysterectomy Prior Authorization Requirements.

All gender-affirming surgeries, including hysterectomies, require prior authorization per Health Care Administrative Rule (HCAR) 4.238 – [Gender Affirmation Surgery for the Treatment of Gender Dysphoria](#). The comments DVHA received during the public comment period for GCR Policy 21-068 pertain to the coverage criteria outlined in HCAR 4.238 and not to GCR Policy 21-068.

DVHA has reviewed these comments and is carefully considering the commenters' requests to remove prior authorization requirement for gender-affirming hysterectomies. This includes review of the prior authorization requirement for hysterectomies outlined in HCAR 4.238. Any changes made to the prior authorization requirement for hysterectomies in HCAR 4.238 would take precedence upon effective date.

DVHA intends to make modifications to HCAR 4.238 and will consider all comments received during the public comment period. DVHA will engage with stakeholders when drafting amendments to HCAR 4.238. Modifications to the rule will be made through the administrative rulemaking process, which includes informal engagement with stakeholders, public notice in the Global Commitment Register, and a formal public comment period and public hearing.