



AGENCY OF HUMAN SERVICES  
DEPARTMENT OF VERMONT HEALTH ACCESS

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**State of Vermont**  
**Department of Vermont Health Access**  
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**Date:** January 13, 2023

**RE:** Response to comments for GCR 22-101 [Changes to Prior Authorization Requirements](#).

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A summary of comments received, and the Department of Vermont Health Access (DVHA) response is included below. Comments were received from a chiropractic provider and the Vermont Chiropractic Association.

Comment:

The Vermont Chiropractic Association opposes that an Academy Council of Chiropractic Pediatrics (ACCP) certification is necessary to waive prior authorizations for pediatric patients.

Response:

While DVHA agrees that all licensed chiropractic physicians are adequately trained to examine and treat neuromuscular conditions, DVHA recognizes that an Academy Council of Chiropractic Pediatrics (ACCP) certification, with 200 additional hours of training, demonstrates further specialization and expertise for treatment of the pediatric population. Therefore, DVHA will allow providers with this specialized certification to treat pediatric Medicaid members without obtaining prior approval for these services.

Comment:

The Vermont Chiropractic Association requested utilization data for the past two years outlining the difference in utilization for ACO versus non-ACO patients.

Response:

Utilization data outlining the difference in utilization for ACO versus non-ACO patients is not available.

Comment:

A chiropractic provider commented in support of the change to prior authorization requirements for children for providers with ACCP credentials and asked how to inform CMS of their ACCP certification.

Response:

DVHA appreciates the comment in support for the change. Medicaid enrolled providers with ACCP credentials should inform DVHA Member and Provider Services at



[AHS.DVHAMemberProviderSvc@vermont.gov](mailto:AHS.DVHAMemberProviderSvc@vermont.gov). Providers are not required to inform CMS of their certification.