



State of Vermont
Agency of Human Services
280 State Drive
Waterbury, VT 05671-1000
www.humanservices.vermont.gov

Jenney Samuelson, Secretary
Todd Daloz, Deputy Secretary

[phone] 802-241-0440
[fax] 802-241-0450

Date: August 24, 2023

Re: Response to Public Comments for Global Commitment Register (GCR) notice 22-125: [Medicaid Investment: Medically Necessary Abortions](#)

Comments received are included below, along with a response from the Agency of Human Services (AHS).

State Response to Comments:

The Agency of Human Services appreciates the commenters' support of this Medicaid investment. In order to access these funds for eligible patients, Vermont Medicaid providers should contact their provider representatives. Claims should be submitted to the provider representative along with a completed [Abortion Certification 219A form](#). Form 219B will not be accepted for this investment. Gainwell Provider Services can be reached at 800-925-1706.

Comment #1:

Planned Parenthood of Northern New England strongly supports the expansion of payment for medically necessary abortion for people regardless of Medicaid eligibility or state or country of residence. Abortion is healthcare, and attacks on abortion access at the national level make it critically important that Vermont do everything possible to ensure people get the healthcare that they need.

PPNNE would appreciate detailed instructions on how to access these funds for eligible patients.

Thank you so much!

Lucy Leriche (She/Her/Hers)
Vice President, Public Affairs, Vermont
Planned Parenthood of Northern New England
Planned Parenthood Vermont Action Fund

Comment #2:

Comment #2 can be found on the following page.



Vermont Chapter

INCORPORATED IN VERMONT

American Academy of Pediatrics
DEDICATED TO THE HEALTH OF ALL CHILDREN®



To: Medicaid Policy Unit, via email to AHS.MedicaidPolicy@Vermont.gov
From: Jessa Barnard, Vermont Medical Society, jbarnard@vtmd.org
Date: January 12, 2023
RE: GCR 22-125, Medicaid Investment: Medically Necessary Abortions

The Vermont Medical Society, Vermont Academy of Family Physicians, American Academy of Pediatrics Vermont Chapter and Vermont Psychiatric Association submit these joint comments in response to GCR 22-135, Medicaid Investment: Medically Necessary Abortions. We write to support the proposed use of the State's authority under the Global Commitment to Health Section 1115 Demonstration waiver to fund abortion services without regard to residency requirements or income.

Our organizations support the statement in the new investment application that there are major health disparities in rates of unintended pregnancies and that the physical, psychological, and economic ramifications of carrying an unintended pregnancy to term because of barriers to abortion care are enormous. We support access to abortion as a component of comprehensive health care and believe any potential barrier to access should be removed. As such, we support the Administration's proposal to leverage state and federal funds to help improve access to medically necessary abortions, regardless of whether the patient receiving care is a Vermont resident or if their income exceeds Medicaid limits.

Thank you for this proposal and please reach out to me for additional information.