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**State of Vermont**  
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**Date:** December 7, 2023

**Re:** Response to Public Comments for Global Commitment Register notice GCR 23-104 Telehealth Coding.

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

**Comment:** I recently received your notice about the GCR 23-104 update to telehealth coding and was happy to see that this will now be more consistent with other payers. However, when I shared the news with my colleagues I was surprised to be met with concern from one of them that the change will result in a lower rate for telehealth providers.

She told me that she believes that unlike with other payers, Medicaid telehealth in-home (10 code) is paid at a lower rate than out of home (02) code. I'm not really sure how she could know this, as we have not been using this coding yet, but thought I'd investigate anyway to be safe. Can you verify whether this is accurate information, will there be a difference in remission for 02 and 10?

**State Response:** Vermont Medicaid reimbursement does not differ based on telehealth place of service codes. Providers should work with their Medicaid provider representative on any questions they have about particular coverage or billing. The regional representatives can be found here:  
<http://vtmedicaid.com/assets/resources/ProviderRepMap.pdf>.

**Comment:** Within the policy summary, I read that: "Effective January 1, 2024, place of service and modifier guidance given during the public health emergency period is no longer applicable." Does this mean that the new and revised place of service codes and modifiers will go into effect on January 1, 2024, or does it mean that providers will no longer be able to bill for telehealth sessions beginning on that date?

**State Response:** The place of service and modifier guidance is changing as outlined in GCR 23-104. Telehealth service delivery will continue beyond January 1, 2024. Additional information regarding Vermont Medicaid telehealth coverage can be found in the resources listed in GCR 23-104.