



State of Vermont
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Al Gobeille, Secretary
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Date: August 10, 2018

RE: Responses to Public Comments for GCR 17-080 Electric Breast Pump Coverage Change

A summary of comments received and the Agency of Human Services' responses to those comments is included below. Comments were received from Vermont Legal Aid, Inc., Morris & DeMag, Inc, Accelleron, and Sally Pennington, RNC, IBCLC.

1) Limitations for mothers and personal use double electric breast pumps:

Comment: Commenters recommended that the breast pump limitation of one pump every three years be amended to one pump per pregnancy. Additionally, there was a question whether the timeframe would be based on date of service or calendar years.

Response: We anticipate that mothers who have another child within three years will be able to re-use the breast pump that Medicaid purchased for them. Three years will be based on the date of service not calendar years.

Comment: It was recommended that 60 days post-partum and mothers being away from their infant on a regular basis be removed.

Response: We have considered this recommendation, but at this time we will not be making changes to the beneficiary requirements.

Comment: It was asked if a mother could obtain a personal use electric breast pump once she no longer needs a hospital grade breast pump as long as she still meets the beneficiary requirements.

Response: Yes.

2) Covered personal use double electric breast pumps:

Comment: Recommendations were received to add the Spectra S1 and Hygeia Enjoye pumps to the list of covered pumps.

Response: We have added these to our list of covered pumps.

Comment: Comments were received that some of the covered double electric breast pumps were considered inadequate.

Response: Medicaid recognizes that not every pump works for every mother. A list of covered pumps was created with the expectation that mothers will consult with their provider and/or lactation consultant to determine which pump is best for them.

Comment: A recommendation was made to include criteria (infant with a congenital anomaly and mother hospitalized and separated from newborn/infant) to the double electric breast pumps criteria.

Response: Both recommended criteria are covered. Mothers that are hospitalized and separated from their newborn/infant falls into the category of separated from their newborn/infant and would be eligible for a personal use double electric breast pump. Often, those mothers have access to a hospital grade breast pump through the hospital. For situations where the infant has a congenital anomaly, hospital grade breast pumps are more effective in helping mothers maintain their milk supply if their newborn is not available to feed at the breast.

3) **Durable Medical Equipment (DME) Providers and Billing**

Comment: A question was received asking if there are any specific diagnosis codes that need to be used to bill for the personal use pump.

Response: Vermont Medicaid does not require specific diagnosis codes for coverage.

Comment: Comments were received that Vermont DME providers be given priority due to the personal service that is provided to mothers and interest of supporting Vermont businesses.

Response: Vermont Medicaid currently has several local DME providers enrolled. We encourage those that are not currently enrolled to apply.

4) **Supplies**

Comment: A question was received regarding whether supplies for personal use double electric breast pumps would be covered.

Response: Supplies will only be covered for hospital grade breast pump rentals at the time of initial rental.