Act 111 Update

Date of Notice: November 1, 2025



An Independent Licensee of the Blue Cross and Blue Shield Association.









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Ordering Primary Care Provider:

Beginning January 1, 2026, prior authorizations for medically necessary services (excluding prescription drugs or out of network services) are waived if a member is covered by a Vermont state regulated plan and the ordering provider meets the requirements below:

Provider Type Set up in Blue Cross VT System (enrolled, credentialed and contracted)	Provider Location (and when appropriate provider type)	Eligible for a Waiver
Primary Care Provider (PCP)	Vermont	Yes, if there is a primary care contract with Blue Cross VT
Primary Care Provider (PCP)	Vermont and County Contiguous to Vermont	Yes, if there is a primary care contract with Blue Cross VT that covers the location(s).
Primary Care Provider	County Contiguous to Vermont	No
Dual Specialty Provider	Vermont - Specialist County Contiguous to Vermont – PCP	No, for any location(s)
Specialist	Vermont or County Contiguous to Vermont	No

Change: Prior to January 1, 2026, only primary care providers enrolled in Blueprint qualified for a waiver.

Billing Provider/Practice/Vendor:

There are very specific claim submission requirements that must be followed for the claim to bypass the prior authorization requirements. Details are in Section 12 of our on-line Provider Handbook: www.bluecrossvt.org/documents/provider-handbook