




Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Robert R. Neall, Secretary

To: Maryland School-Based Health Center Administrators

From: Tricia Roddy, Assistant Medicaid Director 

Re: Telehealth Guidance for School-Based Health Centers during the COVID-19 Public Health Emergency

September 1, 2020

On March 5, 2020, Governor Lawrence J. Hogan, Jr., declared a state of emergency due to disease (“COVID-19”) caused by the novel coronavirus. During the state of emergency, all health care practitioners may render Medicaid reimbursable telehealth services within their scope of practice. The Secretary of Health has expanded the definition of a telehealth originating site under COMAR 10.09.49.06 (the Maryland Medicaid Telehealth Program) to include a participant’s home or any other secure location as approved by the participant and the provider for purpose of delivery of Medicaid-covered services. On March 20, 2020, Governor Hogan issued [Executive Order No. 20-03-20-01](#) to allow the Secretary of Health to authorize the reimbursement of audio-only health care services and to grant further flexibility regarding the use of HIPAA-compliant telehealth technology during the state of emergency. These authorizations apply to services delivered to a Medicaid participant via fee-for-service or through a HealthChoice Managed Care Organization (“MCO”) during the state of emergency.

This guidance clarifies how School-Based Health Center (“SBHC”) sponsoring agencies should bill Medicaid for covered services delivered via telehealth to eligible Medicaid participants. When billing for services rendered via audio-video or audio-only modalities, SBHC sponsoring agencies must adhere to the following:

- 1. Federal Rules (Clinic Services):** SBHCs must adhere to federal Medicaid regulations governing clinics (42 CFR § 440.90 - Clinic Services). Under normal circumstances, Medicaid may not reimburse SBHCs or other clinics if neither the practitioner nor patient is physically located within the clinic. This requirement applies to all freestanding clinics participating in the Maryland Medicaid program, regardless of whether they are community-based clinics or SBHCs.

On August 31, 2020, the Centers for Medicare and Medicaid Services (CMS) approved additional flexibilities to Maryland’s waiver under section 1135 of the Social Security Act to address challenges posed by COVID-19. CMS granted Maryland a temporary waiver of the rule requiring that either the practitioner or patient be physically located within the clinic when billing Maryland Medicaid for services. The waiver permits services provided via telehealth from clinic practitioners’ homes (or another location) to be considered to be provided at the clinic for purposes of 42 C.F.R. § 440.90(a). Under this authority, SBHCs may receive Medicaid reimbursement for services rendered if both the practitioner and the patient are in their homes for the duration of the federal government’s declared public health emergency. The waiver has a retroactive effective date of March 1, 2020, and will terminate when the federal public health emergency ends.

2. **Modifiers:** When billing Medicaid or a HealthChoice MCO for an audio-video telehealth visit or an audio-only visit, sponsoring agencies should bill using the usual procedure code with the appropriate modifier.
 - To bill for services delivered via two-way audio-visual telehealth technology assisted communication, providers must bill for the appropriate service code and use the “-GT” modifier.
 - To bill for audio-only telephonic services, providers must bill for the appropriate service code and use the “-UB” modifier to identify the claim as a telephonically delivered service.

3. **Place of Service (POS):** SBHC sponsoring agencies should bill using the same POS code that would be appropriate for a non-telehealth claim.
 - **If conducting a telehealth visit with a student enrolled with a SBHC (or family member who is also enrolled) who would normally be eligible to receive in-person care at the SBHC, sponsoring agencies should use POS code 03 (School).** Sponsoring agencies should use POS code 03 for such visits regardless of the physical location of the student and the rendering practitioner.
 - **If a SBHC location adds or maintains telehealth services and wishes to use their telehealth service model to see patients they would not normally see (i.e., patients that are not associated with the student population), the sponsoring agency should not bill for the services as a SBHC. For such visits, sponsoring agencies should use POS code 11 (Office).** Services to these recipients are not considered to be self-referred under COMAR 10.67.06.28. SBHCs should not use the 03 (School) POS when billing for services rendered to patients who would otherwise not be able to receive in person care at the SBHC. Note that MCOs are not required to reimburse for such services if the sponsoring agency has not contracted with the MCO.

- **SBHCs may NOT bill using the 02 (Telehealth) code in the POS field.**

For questions about becoming a SBHC, please contact the Maryland State Department of Education. For approval to add telehealth services to an existing MSDE approved SBHC, contact Dr. Cheryl De Pinto at cheryl.depinto@maryland.gov.

The telehealth care and regulatory landscape is rapidly evolving during this time. If you have a question about a scenario that is not addressed above, please do not hesitate to contact us. Please regularly check <https://mmcp.health.maryland.gov/Pages/telehealth.aspx> for updated Medicaid telehealth guidance, and direct questions about Medicaid reimbursement for telehealth services to mdh.telemedicineinfo@maryland.gov.