




Wes Moore, Governor · Aruna Miller, Lt. Governor · Meena Seshamani, M.D., Ph.D., Secretary

**MARYLAND MEDICAL ASSISTANCE PROGRAM**  
**Outpatient Mental Health Clinics Transmittal No. 1**  
**Behavioral Health Administrative Service Organization Transmittal No. 36**  
**June 9, 2025**

**TO:** Outpatient Mental Health Centers (OMHCs)  
 Behavioral Health Administrative Services Organization (BHASO)

**FROM:**   
 Tricia Roddy, Deputy Medicaid Director  
 Maryland Medicaid

**RE:** Waived Four Walls Requirement - Outpatient Mental Health Clinics

**NOTE:** Please ensure that appropriate staff members in your organization are informed of the contents of this transmittal

This transmittal supersedes the previous guidance provided by the Maryland Department of Health (MDH) on July 15, 2024 [PT 21-25 Policy Clarification – Four Walls Requirement Termination](#).

Upon Centers for Medicare & Medicaid Services (CMS) guidance, the MDH pursued the State Plan pathway for the exemption for OMHCs. On May 19, 2025, the state received CMS approval to update the Maryland State Plan to waive the Four Walls requirement for Outpatient Mental Health Centers (OMHCs). As of June 1, 2025, Maryland Medicaid participating OMHCs may now provide and submit claims for services rendered via telehealth when both the practitioner and patient are offsite at clinic rates. The Department is still pursuing §1115 Waiver Amendment authority for local health departments.

For questions related to this transmittal, please contact [mdh.mabehavioralhealth@maryland.gov](mailto:mdh.mabehavioralhealth@maryland.gov).