

Payer Telehealth Policies

A Reference Guide for Ambulatory Practices

Background

In 2020, State Executive Orders, federal waivers, and actions taken by payers made telehealth adoption and use easier for health care providers and consumers.^{1,2} During the 2021 legislative session, the Maryland General Assembly passed legislation (Chapter 70/Chapter 71) extending certain coverage for telehealth, including audio-only through June 30, 2023.³ Telehealth policies among government payers (Medicare and Medicaid) are similar. There is close alignment of telehealth policies among private payers for fully-insured⁴ plans; variation in coverage can exist across self-funded plans.⁵

HIPAA

The Department of Health and Human Services, Office for Civil Rights (OCR) is the federal agency responsible for enforcing the Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy and Security Rules. OCR is exercising enforcement discretion and not imposing penalties for noncompliance with HIPAA in connection with the good faith provision of telehealth during the nationwide public health emergency.⁶ This includes use of non-public facing video chat and text-based applications, such as Apple FaceTime and Facebook Messenger. Public-facing applications such as TikTok and Facebook Live are not permitted.⁷

About this Reference Guide

Information included in the tables that follow was obtained from payer websites and is intended for educational purposes; users of this document are encouraged to contact payers for the most up to date information. Items from the Current Procedural Terminology CPT* code set used are a copyright of the American Medical Association (AMA).⁸ Italicized items represent changes implemented in response to the PHE waiving certain use requirements for telehealth, some of which have become permanent.⁹ Practices are encouraged to verify patient eligibility and reimbursement for telehealth before scheduling a telehealth encounter.

¹The Department of Health and Human Services first declared a public health emergency in January 2020. States will be provided with 60-day notice prior to termination of the public health emergency.

² Governor Hogan enacted a Maryland State of Emergency in March 2020, which was extended every 30 days until it expired on July 1, 2021. Governor Hogan enacted a State of Emergency on January 4, 2022 for 30-days.

³ More information available at: mgaleg.maryland.gov/mgawebsite/Legislation/Details/HB0123

⁴ COMAR 10.25.16.02(B)(5): Fully-insured plans are those where an employer pays a per-employee premium to a payer to assume the risk of providing health care coverage for their employees or an individual pays a premium to an insurance carrier for health care coverage.

⁵ COMAR 31.11.02.02(B)(8): Self-funded plans (also known as self-insured) are those where an employer pays to provide its employees with hospital, medical, surgical, or major medical benefits on an expense-incurred basis similar to benefits which could be provided under a group health insurance policy.

⁶ See n. 1, Supra.

⁷ OCR Announces Notification of Enforcement Discretion for Telehealth Remote Communications During the COVID-19 Nationwide Public Health Emergency, available at: www.hhs.gov/about/news/2020/03/17/ocr-announces-notification-of-enforcement-discretion-for-telehealth-remote-communications-during-the-covid-19.html.

⁸ Use of this information is permitted for educational purposes under the Copyright Law of the United States (Title 17), Section 107 - Limitations on exclusive rights: Fair use.

⁹ The 2021 Medicare Physician Fee Schedule added over 60 services to the list of services payable when furnished via telehealth that will continue to be covered beyond the end of the PHE. More information available at: www.cms.gov/newsroom/press-releases/trump-administration-finalizes-permanent-expansion-medicare-telehealth-services-and-improved-payment.

Government Payers

	Maryland Medicaid	Medicare
	Eligi	bility
Distant Provider Types	 No restrictions for somatic services as long as the applicable licensing board permits use of telehealth Behavioral Health:* Psychiatrists Psychiatric Nurse Practitioners Advanced Practice Nurses Licensed Clinical Professional Counselor, Licensed Clinical Marriage and Family Therapist, Licensed Clinical Alcohol and Drug Counselor, Licensed Clinical Professional Art Therapists Licensed Clinical Social Worker – Clinical In Outpatient Mental Health Clinics - only under supervision – Licensed Master of Social Worker, Licensed Clinical Social Worker, Licensed Graduate Professional Counselor, Licensed Graduate Alcohol and Drug Counselor, Licensed Graduate Marriage & Family Therapy, Licensed Graduate Professional Art Therapist In American Society of Addiction Medicine Level 1 outpatient Substance Use Disorder (SUD) program, State licensed providers only - Certified Associate Counselor-Alcohol and Drug Federally Qualified Health Centers who bill through the Specialty Behavioral Health System Licensed Psychiatric Rehabilitation Program Licensed Substance Use Disorder Intensive Outpatient Centers Substance Use Disorder Residential Treatment Program See Resources: 1, 3, 4 	 Physicians Nurse Practitioners Physician Assistants Nurse Midwives Clinical Nurse Specialists (CNS) Certified Nurse Anesthetists Clinical Psychologists Clinical Social Workers Registered Dietitians or Nutrition Professionals Physical Therapists Occupational Therapists Speech Language Pathologists See Resources: 1 and 5
Locations	 Originating site Medicaid Program Manual outlines permitted facilities Patient's home or another secure location Distant site 	 Originating site Certain facilities in a rural area Any health care facility or the patient's home regardless of rural designation Distant site
	Any secure, private locationSee Resources: 1, 3, and 4	Any secure, private locationSee Resources: 1 and 3

	Maryland Medicaid	Medicare		
	Eligi	gibility		
Types of Technology	Acceptable telehealth technology in order of priority** • Meets the formal requirements outlined in the Program Manual • Audio-only telephone • For audio-only telephone services, patient must be provided with a clear explanation of potential limitations, including confidentiality, and provide explicit consent See Resources: 1 and 4	 For a telehealth visit, interactive, real-time audio and video telecommunications system For a virtual check-in, system that enables secure communication (e.g., telephone, secure text message/email, video, or image) For an E-Visit, online portal See Resource: 3 		
	Bil	lling		
Originating Site	Same as in-person See Resource: 1	HCPCS Code Q3014 to bill the originating site fee See Resource: 1		
Services	Audio-visual Appropriate CPT code with "GT" modifier	 ■ Audio-visual With GQ/GT-modifier and POS 02 Somatic: 77427; 93797-93798; 93750; 94002-94005; 94625-94626; 94664; 95970-95972; 95983-95984; 96110; 96112-96113; 99202-99205; 99211-99215; 99483; 99495-99496; G0422-G0423 Hospital: 99217-99226; 99231-99233; 99234-99236; 99238-99239; 99281-99285; 99291-99292; 99468-99469; 99471-99473; 99475-99480; G0508-G0509 Behavioral Health: 90875; 96170-96171; 97151-97158; 0373T; 0362T; G0410; 96125; 97129-97130; 0373T End-Stage Renal Disease (ESRD): 90951-90952; 90953; 90954-90955; 90956; 90957-90958; 90959; 90960-90961; 90962; 90963-90970 Eye: 92002; 92004; 92012; 92014 Speech/Hearing: 92601-92604; S9152; 92526; 92550; 92552-92553; 92555-92557; 92563; 92565; 92567; 92570; 82587; 92588; 92607-92610; 92625-62627; 96105; S9152 Physical Therapy: 97110; 97112; 97116; 97150; 97161-97164; 97530; 97552; 97750; 97755; 97760; 97761 Occupational Therapy: 97110; 97112; 97150; 97165-97168; 97530; 97755; 97760-97761 Physical Medicine and Rehabilitation Evaluations: 97530; 97542; 97750; 97755; 97760; 97761 Home Health: 99324-99328; 99334-99335; 99336-99337; 99341-99345; 99347-99348; 99349-99350 Skilled Nursing Facility: 99304-99306; 99307-99310; 99315-99316; G9685 		

	Maryland Medicaid	Medicare
	Bi	Iling
Services Cont.	Audio-only Telephone The following with the "-UB" modifier Somatic Services: 99211-99213 Behavioral Health: 99211-99215; 90832-90834; 90836; 90837; 90839-90840; H0016; H0001; H0004; H2036; H2018 Residential Substance Use Disorder Treatment billed the same as inperson services See Resources: 1, 3 and 4	 Audio-visual or Audio-only With GQ/GT-modifier and POS 02 Somatic: 97535; 99212-99214; 99406-99407; 99497-99498; G0108-G0109; G0296; G0406-G0408; G0425-G0427; G0438-G0439; G0506; G0513-G0514; G2211 Hospital: 99356-99357; G0459; G2212 Health Risk Assessment: 96160-96161 Behavioral Health: 90785; 90791-90792; 90832-90834; 90836-90840; 90845-90847; 90853; 96116; 96121; 96127; 96130-96133; 96136-96139; 96156; 96158; 96159; 96164-96165; 96167-96168; 99354-99355; G0396-G0397; G0442-G0446; G2086-G2088 ESRD: G0420-G0421 Speech/Hearing: 92507-92508; 92521-92524 Nutrition: 97802-97804; G0270; G0447 Telephone Only 99441-99443 Virtual Check-Ins (several modalities) G2012, G2251 Not related to a medical visit within the previous 7 days Does not lead to a medical visit within the next 24 hours E-Visit (online portal) 99421-99423; G2061-G2063; 98970-98972 Patient initiated Occurs over a maximum of 7 days See Resources: 1, 2 and 3, 6
Cost-Sharing (Copayments, Deductibles, Coinsurance)	Same as in-person visits See Resource: 1	 Generally, applies to services rendered For telehealth visits only, flexibility to reduce or waive cost-sharing paid by federal health care programs (may not apply to virtual check ins or e-visits) See Resources: 3 and 4
	Res	ources
	Maryland Medicaid Telehealth Program Manual Maryland Medicaid Telehealth Program Website Maryland Medicaid Provider Guidance Preserve Telehealth Access Act of 2021	Centers for Medicare and Medicaid Services (CMS) Telehealth Services List of Medicare Telehealth Services Payable under Physician Fee Schedule Medicare Telemedicine Health Care Provider Fact Sheet Medicare Telehealth Physicians and Other Clinicians: CMS Flexibilities to Fight COVID-19 2021 Annual Update to the Therapy Code List

^{*}Behavioral health providers must be enrolled in the Maryland Department of Health's Specialty Behavioral Health Program

^{**}May not apply to remote patient monitoring

Private Payers

	Aetna	CareFirst	Cigna	Kaiser	UnitedHealthcare
Payer Sponsored Telehealth Program (through third- party vendor)	Teladoc® MinuteClinic See Resource: 1	• CareFirst Video Visit See Resource: 2	Cigna Telehealth Connection (MDLIVE and Amwell) See Resources: 2 and 3	Kaiser Permanente Video Visits See Resource: 1 Eligibility	Virtual Visits (Teladoc, American Well and Doctor on Demand) See Resource: 1
Distant Provider Types	In-network providers (see Availity portal) See Resource: 1	Clinicians and Associated Nurse Practitioners in: Primary Care General Practice Internal Medicine Pediatrics OBGYN Behavioral Health Psychiatrists Nurse Practitioners Psychologists Licensed Certified Social Workers Licensed Professional Counselors Dentists See Resource: 1	In-network providers See Resource: 1	In and out-of-network providers	 Physicians Nurse Practitioners Physician Assistants Nurse-Midwives Clinical Nurse Specialists Registered Dietitian or Nutrition Professionals Clinical Psychologists Clinical Social Workers Certified Registered Nurse Anesthetists Physical Therapists Occupational Therapists Speech Therapists Chiropractic Therapists Home health Hospice Dentists See Resources: 2, 3, 7, 9 and 11
Locations	Check with carrier	Check with carrier	Check with carrier	Check with carrier	Telehealth and Telemedicine Policy outlines permitted originating site facilities (see resources) Patient's home or other secure location are permitted as an originating site See Resources: 2 and 4

	Aetna	CareFirst	Cigna	Kaiser	UnitedHealthcare		
	Billing*						
Types of Technology	 Synchronous audio-visual connection in accordance with Telemedicine Policy Telephone only for evaluation, care management, and some behavioral health services See Resource: 1 	 Interactive audio, video, or other electronic media Telephone only consultations using 99056 See Resource: 2 	 Audio-visual (preferred) or audio-only (may require review) for somatic care Audio-visual (preferred) or audio only (may require review) for behavioral health See Resource: 4 and 5 	 Audio-visual Telephone only See Resource: 1, 2 	 For a telehealth visit, synchronous audio-visual connection For a virtual check-in, several communication modalities, including telephone For e-visits, online portal See Resource: 3 		
Services	Audio-visual Somatic and Behavioral Health: covered in accordance with Aetna Telemedicine policy Partial Hospitalization Program: H0035, H2036 Dental: With D9995-D9996, any oral evaluation covered under Aetna dental plans Telephone G2012; 98966 – 98968; See Resources: 1 and 2	 Audio-visual or Telephone Telephone-only adds CPT 99056 With GT or 95 Modifier and POS 02: Somatic: 93268; 93270; 93271-93272; 96040; 98960-98962; 99211-99215; 99401-99409; 99496 Behavioral Health: 90785; 90791-90792; 90832-90834; 90836-90838; 90845-90847; 90849; 90863; 96116; 96121; 99354-99355 Skilled Nursing Facility: 99307-99310 	 Audio-visual or Telephone With HCPCS modifier-GT/GQ or CPT modifier-95 Somatic: 96040; 99202-99205; 99211-99215; 99406-99409; G0108; G0396-G0397; G0438-G0439; G0442-G0447; G0459; G0513-G0514 Behavioral Health: 96116; 96156; 96158-96161; 96164-96165; 96167-96168 ESRD: 90951-90970 Nutrition: 97802-97804; G0270 Physical Therapy: 97110; 97112; 97161-97168; 97530; 97755; 97760-97761 Speech/Hearing: 92507-92508; 92521-92524; 92601-92604; S9152 COVID-19: Z03.818, Z20.822, or Z20.828, U07.1, J12.82, M35.81, or M35.89 Telephone Only G2012; 99441-99443 See Resources: 1, 2, 3, and 4 	 Audio-visual or Telephone Appropriate CPT Code with the HCPCS modifier-GT/GQ or CPT modifier-95 and POS 02 Somatic: 93228-93229; 93268; 93270-93272; 93298; 96040; 98960-98962; 99201-99205; 99211-99215; 99241-99245; 99251-99255; 99381-99387; 99391-99397; 99401-99404; 99468-99469; 99497-99498; G0296; G0406-G0408; G0438-G0439; G0459; G0506; G0508-G0509; G0513-G0514; G2061-G2063 Hospital: 99217-99226; 99231-99236; 99238-99239; 99281-99285; 99291-99292; 99354-99357; 99471-99473; 99475-99480; G0425-G0427 Health Risk Assessment: 96160-96161 Radiation Management: 77427 Behavioral Health: 90791-90792; 90832-90834; 90836-90840; 90845-90847; 90853; 90863; 96116; 96121; 96130-96133; 96136-96139; 96156; 96159; 96164-96165; 96167-96168; 97151; 97155-97157; 99046-99409; 99483; G0396-G0397; G0442-G0447; G2086-G2088 	 Audio-visual Services recognized by CMS and appended with HCPCS modifier-GT/GQ Services recognized by the AMA in Appendix P of CPT and appended with CPT modifier-95 POS 02 or 10 Somatic: 93228-93229; 93268; 93270-93272; 96040; 98960-98962; 99202-99205; 99211-99215; 99395-99397; 99406-99409; 99483; 99495-99498; G0108-G0109; G0296; G0406-G0408; G0425-G0427; G0438-G0439; G0506; G0513-G0514; G2211-G2212 Hospital: 99217; 99224-99226; 99231-99233; 99238-99239; 99281-99285; 99291-99292; 99356-99357; 99469; 99472; 99476; 99478-99480; G0459; G0508-G0509 Health Risk Assessment: 96160-96161 		

Aet	na CareFirst	Cigna	Kaiser	UnitedHealthcare	
•	Billing*				
Services (cont.)	 Speech Therapy: 92507 Occupational Therapy: 97530 Nutrition: 97802-97804; S9443 With GT Modifier and POS 02: Somatic: 99497-99498 Health Risk Assessment: 96160-96161 No modifier and POS 02: Somatic: 96105; 96125; Speech Therapy/Hearing: 92508; 92521-92524; 92626-92627; 92630; 92633 Physical Therapy: 97110; 97112; 97161-97162; 97164-97165; 97535 Occupational Therapy: 97199-97130; COVID-19: Z20.828; U07.1 No modifier or POS: Somatic: G2025 Dental: Audio visual with D9995 and POS 02: D0140; D1070 Audio-visual only With GT or 95 Modifier and POS 02: Somatic: 93228-93229; 96110; 99201-99205; 99241-99245; 99251-99255; 99495 Behavioral Health: 90853; 96130-96132; 96136-96137; ESRD: 90951-90952; 90954-90955; 90957-90958; 90960-90961; 90964; 90966; 90968; 90970 		 ESRD: 90951-90955; 90957-90970; G0420-G0421 Speech Therapy: 92526; 92507; 92521-92524 Eye: 92227-92228 Physical Therapy: 97110; 97112; 97116; 97161-97164; 97530; 97535; 97750; 97755; 97760-97761 Occupational Therapy: 97110; 97112; 97165-97168; 97530; 97760-97761 Nutrition: 97802-97804; G0108-G0109; G0270 Skilled Nursing Facility: 99304-99310; 99315-99316 Home Health: 99327-99328; 99334-99337; 99341-99350 Telephone only 98966-98968; 99441-99443; G2012 See Resource: 3 	 Behavioral Health: 90785; 90791-90792; 90832-90834; 90836-90840; 90845-90847; 90863; 90853; 96116; 96121; 96130-96133; 96136-96139; 96156; 96158-96159; 96164-96165; 96167-96168; 99354-99355; G0396-G0397; G0442-G0446; G2086-G2088; G9978-G9986 ESRD: 90951-90970; G0420-G0421 Eye: 92227-92228 Home Health: 99334-99337; 99347-99350; G9489 Nutrition: 97802-97804; G0270; G0447 Skilled Nursing Facility: 99307-99310; 99315-99316 Physical Therapy: 97110; 97112; 97116; 97161-97168; 97530; 97535; 97760-97761 Occupational Therapy: 97110; 97112; 97165-97168; 97530; 97535; 97750; 97755; 97760-97761 Speech Therapy: 92507; 92521-92524; 92526; 96105; 97129-97130 Chiropractic: 99201; 99203-99205; 99211-99213; 97110; 97112; 97116; 97530; 97535; 97750; 97755; 97760-97761 Audio-visual or Audio-only Somatic: G2012, G2251 Dentistry: Consultations for advice and guidance to an appropriate setting for inperson care 	

	Aetna	CareFirst	Cigna	Kaiser	UnitedHealthcare
Services (cont.)		 Eye: 92227-92228 Hospital: 99221-99223; 99231-99233 Home Health: 99341-99350 Physical Therapy: 97530 Speech Therapy: 92526 With GT Modifier and POS 02: ESRD: 90965; 90967; 90969 Behavioral Health: 97151; 97155-97157 No modifier and POS 02: Behavioral Health: 97153 Occupational Therapy: 97166; 97168 Speech Therapy/Hearing: 97533 No modifier and POS 02: Somatic: 99381-99387; 99391-99397 See Resources: 3 			Virtual Check-In (several modalities) G2012 Not related to a medical visit within the previous 7 days Does not lead to a medical visit within the next 24 hours E-visit (online portal) CPT codes 99421-99423; 98970-98972 See Resources: 1, 4, 5, 6, 7, 8, 9, and 10
Cost-Sharing (Copayments, Deductibles, Coinsurance)	Check with carrier	 Waiving fees for COVID-19 related virtual visits See Resource: 1 	 Waiving fees for virtual screening telephone consult (G2012) Waiving fees for COVID-19 related virtual visits See Resource: 1 	Waiving cost sharing for COVID-19 diagnosis and testing	 Waiving fees for COVID-19 related virtual visits See Resource: 1

Aetna	CareFirst	Cigna	Kaiser	UnitedHealthcare		
Resources						
COVID-19: Telemedicine FAQs Billing and coding FAQs	COVID-19 Information for Providers Message from CareFirst CEO CareFirst Procedure Code/Modifier/Place of Service Instructions for Telemedicine Claims During Covid-19 Public Health Emergency	1. Cigna Coronavirus (COVID-19) Interim Billing Guidance for Providers 2. Cigna Telehealth Connection 3. Cigna Telehealth Connection Presentation 4. Cigna Reimbursement Policy Virtual Care 5. COVID-19: Interim Guidance	1. Convenient ways to get care 2. The value of telehealth in a connected system 3. COVID-19 Telehealth Reference Guide for Participating Network Providers Output Description:	1. Telehealth and Telemedicine Policy 2. COVID-19 Telehealth Services 3. COVID-19 Telehealth 4. Optum Provider Express COVID- 19 Updates (Behavioral Health) 5. COVID-19 UnitedHealthcare Telehealth Services: Care Provider Coding Guidelines 6. COVID-19 Physical, Occupational and Speech Therapy Telehealth 7. Telehealth Services for Physical, Occupational and Speech Therapy 8. Chiropractic Therapy 9. Telehealth Services for Chiropractors 10. UnitedHealthcare Dental Launches Teledentistry Option to Help Plan Participants Avoid Unnecessary ER Visits		

^{*}Maryland law10 requires payers to reimburse for services that can be appropriately delivered via telehealth in the same manner as in-person.11

Questions

This document was developed by Justine Springer, MHCC Program Manager.

For questions, email justine.springer@maryland.gov.

^{**}Coverage is provided on the MD Live or Amwell platforms for the following conditions (P=covered for Pediatric): Acne; Allergies; Asthma; Bronchitis; Colds and flu (P); Constipation (P only); Diarrhea; Earaches (P); Fevers; Headaches; Infections; Insect bites; Joint aches; Nausea (P); Pinkeye (P); Rashes; Respiratory infections; Sinus infections; Sore throats; and Urinary tract infections.

^{***}Billing the typical place of service in place of POS 02 ensures providers receive the same reimbursement as they typically get for a face-to-face visit.

¹⁰ Md Code, Insurance Art., §15–139. Available at: mgaleg.maryland.gov/mgawebsite/laws/StatuteText?article=gin§ion=15-139&enactments=false.

¹¹ The law requires coverage for services that are delivered using interactive audio, video, or other telecommunications or electronic technology by a licensed health care provider within their scope of practice at a site other than the site at which the patient is located. Payers can decide not to provide coverage if decision is based on a finding that telemedicine is not medically necessary, appropriate, or efficient. More information available at: mgaleg.maryland.gov/mgawebsite/laws/StatuteText?article=gin§ion=15-139&enactments=false.