




## DEPARTMENT OF HEALTH

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

### Behavioral Health Administration

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To: Behavioral Health Providers

From: Aliya Jones, M.D., M.B.A.   
Deputy Secretary, Behavioral Health

Date: March 12, 2020

Re: Guidance regarding Telehealth Expansion Regulations

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Yesterday, the Maryland Department of Health provided communication regarding the temporary expansion of its regulations to permit the delivery of telehealth services to the home in order to mitigate possible spread of the novel coronavirus (COVID-19). The purpose of this communication is to provide guidance to Public Behavioral Health Providers who are also providing eligible services to non-Medicaid individuals.

Eligible providers covered under Medicaid telehealth regulations may render services via telehealth to individuals reimbursed through state funding. In addition to services types covered by Medicaid, BHA will also grant waivers for the following:

- General physician services within a specialty mental health Institution for Mental Diseases (IMD) may be provided and reimbursed through telehealth;
- Approved existing Targeted Case Management (TCM) providers may provide phone contacts in lieu of face to face visits for emergency situations to TCM eligible participants.

### **Billing:**

Providers must bill for services through the Administrative Service Organization (ASO), in the same manner you would bill for Medicaid funded telehealth services. Providers must bill for the appropriate service code and use the “-GT” modifier to identify the claim as a telehealth delivered service. Providers should bill using the place of service code that would be appropriate as if it were a non-telehealth claim. The distant site provider should bill using the location of the doctor. If a distant site provider is rendering services at an off-site office, they should bill using the place of service office (11). Place of Service Code 02 (Telehealth) is not

recognized for Maryland Medicaid participants except for use on Medicare crossover claims to specify services rendered through a telecommunication system for dual eligible participants.

**Provider Restrictions:**

Providers are only permitted to render telehealth services within their scope of practices. The PBHS has determined that psychiatric rehabilitation programs (PRP) services are not appropriate for the delivery via telehealth in the home setting.

American Society for Addiction Medicine (ASAM) Substance Use Disorder (SUD) Residential Treatment Programs (levels 3.1, 3.3, 3.5, 3.7 and 3.7WM), residential crisis programs, and residential rehabilitation programs are expected to meet the minimum on-site staffing requirements for service delivery.

Providers should also abide by the requirements of the licensure boards for physicians, social workers and professional counselors. Below please find guidance documents governing the provision of tele-health services by profession.

<b>Social Workers</b>	<a href="http://www.dsd.state.md.us/COMAR/SubtitleSearch.aspx?search=10.42.10">http://www.dsd.state.md.us/COMAR/SubtitleSearch.aspx?search=10.42.10</a>
<b>Professional Counselors</b>	<a href="http://www.dsd.state.md.us/COMAR/SubtitleSearch.aspx?search=10.58.06">http://www.dsd.state.md.us/COMAR/SubtitleSearch.aspx?search=10.58.06</a>
<b>Physicians</b>	<a href="http://www.dsd.state.md.us/COMAR/SubtitleSearch.aspx?search=10.32.05">http://www.dsd.state.md.us/COMAR/SubtitleSearch.aspx?search=10.32.05</a>

**Telehealth resources for Behavioral Health professionals:**

- <https://mmcp.health.maryland.gov/Pages/telehealth.aspx>
- The Maryland Health Care Commission provides links to general questions regarding providing telemedicine including a readiness assessment guide and the Mid Atlantic Telehealth Resource Center:  
[https://mhcc.maryland.gov/mhcc/pages/hit/hit\\_telemedicine/hit\\_telemedicine.aspx](https://mhcc.maryland.gov/mhcc/pages/hit/hit_telemedicine/hit_telemedicine.aspx)
- The American Psychiatric Association (APA) along with the American Telemedicine Association (ATA), issued "Best Practices in Videoconferencing Based Telemental Health" a guide for behavioral health providers who want to do telemental health, including telepsychiatry. The guide may be found at:  
<https://www.psychiatry.org/psychiatrists/practice/telepsychiatry/blog/apa-and-ata-release-new-telemental-health-guide>
- The National Association of Social Workers along with other organizations issued a guide, "Technology in Social Work Practice." The guide may be found at:  
<https://www.aswb.org/news/technology-standards-in-social-work-practice/>

- SAMHSA issued “TIP 60: Using Technology-Based Therapeutic Tools in Behavioral Health Services.” The guide may be found at: <https://store.samhsa.gov/product/TIP-60-Using-Technology-Based-Therapeutic-Tools-in-Behavioral-Health-Services/SMA15-4924>

Additional guidance related to COVID 19 will be forthcoming through BHA or your local addiction or behavioral health authority.