Payer Telehealth Policies

A Reference Guide for Ambulatory Practices

Overview

Telehealth coverage and reimbursement expanded in 2020 in response to the COVID-19 public health emergency (PHE).[1,2] Variation in coverage for telehealth services exists across different payers and plan types.[3] Most states and private payers have largely followed federal telehealth policy changes. This includes permanent changes to rules around the delivery of behavioral/mental telehealth services, including removing geographical and originating site restrictions, permitting certain provider types to serve as distant site providers (FQHCs, RHCs, marriage and family therapists, and mental health counselors), and allowing the delivery of audio-only telehealth services if certain conditions are satisfied.[4,5] In March 2025, Congress extended Medicare temporary waivers that allow for non-behavioral/mental health visits to be provided by all eligible Medicare providers and delivered from any location through September 30, 2025; this includes audio-only telehealth flexibilities.[6]

About this Reference Guide

This reference guide is for informational purposes and intended to assist practices with locating information on telehealth policies for government and private payers. Users of this document are encouraged to contact payers for the most up to date information when verifying patient eligibility and coverage and reimbursement for telehealth.

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[1] U.S. Department of Health and Human Services (HHS) declared a PHE in January 2020. The PHE ended on May 11, 2023.

[2] A Maryland State of Emergency was declared in March 2020 and expired on July 1, 2021. A State of Emergency was renewed on January 4, 2022 for a duration of 30-days.

[3] Maryland law (Md Code, Insurance Art., §15–139, 2013) requires payers to reimburse for services that can be appropriately delivered via telehealth in the same manner as in-person. More information is available at: mgaleg.maryland.gov/mgawebsite/laws/StatuteText?article=gin&section=15-139&enactments=false.

[4] Centers for Medicare and Medicaid Services, *Medicare Physician Fee Schedule Final Rule Summary: CY 2025*, November 21, 2024. Available at: www.cms.gov/files/document/mm13887-medicare-physician-fee-schedule-final-rule-summary-cy-2025.pdf.

[5] HHS, Telehealth policy updates. Available at: telehealth.hhs.gov/providers/telehealth-policy/policy-changes-after-the-covid-19-public-health-emergency#permanent-medicare-changes.

[6] H.R.1968 - Full-Year Continuing Appropriations and Extensions Act, 2025. Available at: www.congress.gov/bill/119th-congress/house-bill/1968/text.

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Government Payers

	Maryland Medicaid	Medicare
	Eligibility	
Providers	• As permitted by applicable licensing board ○ [Maryland Medicaid Synchronous Telehealth Policy Guide](#), Page 2	• [Centers for Medicare and Medicaid Services (CMS) Telehealth Services](#), Pages 3-4 • [Medicare Physician Fee Schedule Final Rule Summary: CY 2025](#), Pages 2-3

Locations	• Originating and hub/distant sites
	  ○ [Maryland Medicaid Synchronous Telehealth Policy Guide](#), Page 2
		• Originating Site
		  ○ [Centers for Medicare and Medicaid Services (CMS) Telehealth Services](#), Pages 3-4
		• Distant Site
		  ○ [Centers for Medicare and Medicaid Services (CMS) Telehealth Services](#), Pages 3-4

Technology	• [Maryland Medicaid Synchronous Telehealth Policy Guide,](#) Pages 2-3	• [Telehealth](#) • [eVisit](#) • [Virtual Check In](#)
	Billing	
Originating Site	• [Maryland Medicaid Synchronous Telehealth Policy Guide,](#) Page 2	• [Centers for Medicare and Medicaid Services (CMS) Telehealth Services](#), Pages 4-5

Services	• **Audio-Visual**, "GT" modifier
	  ○ [Maryland Medicaid Synchronous Telehealth Policy Guide,](#) Page 3
	• **Audio-Only,** "-UB" modifier
	  ○ [Maryland Medicaid Synchronous Telehealth Policy Guide](#), page 3
		• **Audio-visual and *Audio-only*** , POS 02 and GT-modifier (critical access hospitals only)
		  ○ [List of Medicare Telehealth Services Payable under Physician Fee Schedule](#)
		• **Audio-Only**
		  ○ [List of Medicare Telehealth Services Payable under Physician Fee Schedule](#)
		  ○ 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)**
		  ○ Patient initiated
		  ○ Occurs over a maximum of 7 days

	Maryland Medicaid	Medicare
	Billing	
Cost-Sharing *(Copayments, Deductibles, Coinsurance)*	• [Maryland Medicaid Synchronous Telehealth Policy Guide](), Page 1	• [Medicare Telehealth]()
	Additional Resources	
	1. [Maryland Medicaid Telehealth Program Website]()	

Private Payers

	Aetna	CareFirst	Cigna	Kaiser	UnitedHealthcare
Payer Sponsored Telehealth Program (through third-party vendor)	• [Telehealth services](#)	• [CareFirst CloseKnit](#)	• [Cigna Virtual Care](#)	• [Convenient ways to get care](#)	• [24/7 Virtual Visit](#)
Eligibility					
Providers	• [Aetna Availity Portal](#)	• [CareFirst Provider Manual](#), Page 3.2 • [CareFirst Healthcare Providers Webpage](#)	• [Cigna Reimbursement Policy Virtual Care](#), Pages 1-4	• [Kaiser Community Provider Portal](#)	• [Telehealth and Telemedicine Policy](#), Page 3
Locations	• [Aetna Availity Portal](#)	• [Medical Policy Reference Manual, Medical Policy Operating Procedure, 2.01.072A Telemedicine, Pages 1-2](#)	• [Cigna Reimbursement Policy Virtual Care](#), Pages 1-4	• [Kaiser Community Provider Portal](#)	• [Telehealth and Telemedicine Policy](#), Page 2-3
Billing					

Technology	• [Aetna Availity Portal](#)	• Interactive audio, video, or other electronic media
		   ○ [Medical Policy Reference Manual, Medical Policy Operating Procedure, 2.01.072A Telemedicine, Page 1](#)
		• *Audio only consultations using 99056*
		   ○ [CareFirst Healthcare Providers Webpage](#)
			• [Cigna Reimbursement Policy Virtual Care](#), Pages 1-4	• [Kaiser Community Provider Portal](#)	• [Telehealth and Telemedicine Policy](#), Page 3

	Aetna	CareFirst	Cigna	Kaiser	UnitedHealthcare
	Billing				

Services	**Audio-visual**
	• Somatic
	  ○ Aetna Availity Portal
	• Behavioral Health
	  ○ Approved Behavioral Health Telemedicine Services
	Audio only with modifiers - 93 or FQ
	• Aetna Availity Portal
		Audio-visual, GT or 95 Modifier and POS 02
		
		Audio-only adds CPT 99056
		• CareFirst Procedure Code/Modifier/Place of Service Instructions for Telemedicine Claims During Covid-19 Public Health Emergency
			Audio-visual, HCPCS modifier-GT or CPT modifier-95
			Audio Only, CPT modifiers - 93 and FQ
			• Cigna Reimbursement Policy Virtual Care, Pages 4-11
				Audio-visual, GT or 95 modifier or POS 02 or 10
				
				Audio-only, GQ modifier or POS 02 or 10
				• Kaiser Community Provider Portal
					Audio-visual, POS 02 or 10
					
					Audio-only, with POS 02 or 10 and 93
					• Communication Technology-Based Services and Remote Physiologic Monitoring Eligible Codes

	Additional Resources				
Resources		• Telemedicine Guidelines			

Questions

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