

# Broadening Access to Telehealth During a Public Health Emergency

## Overview

Telehealth is a practical solution for health care providers during the COVID-19 Public Health Emergency (PHE), helping patients receive preventive and acute care while maintaining social distancing.<sup>1</sup> Following the federal declaration of a PHE in January 2020, Medicare, Maryland Medicaid, and private payers implemented specific measures waiving certain use requirements for telehealth.<sup>2</sup> These actions aim to minimize spread of the virus and support the health care system in maintaining capacity to treat patients if a threat to public health were to overburden the system.<sup>3, 4</sup> In general, changes in telehealth policy include:

- Removing geographical and facility type restrictions;
- Expanding eligible provider types that can deliver telehealth services;
- Reimbursing for more services delivered via telehealth, including those using audio-only telephone calls; and
- Reducing or eliminating cost-sharing.

Generally, there is alignment of telehealth policy changes across payers; some variation may exist based on plan type (e.g., fully-insured and self-insured).<sup>5</sup> Follow payer links to the right for more information or refer to this MHCC guidance document:

*Payer Telehealth Policies: A Reference Guide for Ambulatory Practices*

[mhcc.maryland.gov/mhcc/pages/hit/hit/documents/HIT\\_Payer\\_Coverage\\_Billing\\_Expansion\\_COVID\\_19\\_Flyer.pdf](https://mhcc.maryland.gov/mhcc/pages/hit/hit/documents/HIT_Payer_Coverage_Billing_Expansion_COVID_19_Flyer.pdf).

Providers are encouraged to contact payers for additional information.

### Medicare

[www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet](https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet)

### Maryland Medicaid

[mmcp.health.maryland.gov/Pages/telehealth.aspx](https://mmcp.health.maryland.gov/Pages/telehealth.aspx)

### Aetna

[www.aetna.com/health-care-professionals/provider-education-manuals/covid-faq/telemedicine.html](https://www.aetna.com/health-care-professionals/provider-education-manuals/covid-faq/telemedicine.html)

### CareFirst

[individual.carefirst.com/individuals-families/about-us/coronavirus-telemedicine.page](https://individual.carefirst.com/individuals-families/about-us/coronavirus-telemedicine.page)

### Cigna

[static.cigna.com/assets/chcp/resourceLibrary/medicalResourcesList/medicalDoingBusinessWithCigna/medicalDbwcCOVID-19.html](https://static.cigna.com/assets/chcp/resourceLibrary/medicalResourcesList/medicalDoingBusinessWithCigna/medicalDbwcCOVID-19.html)

### UnitedHealthcare

[www.uhcprovider.com/en/resource-library/news/Novel-Coronavirus-COVID-19/covid19-testing/covid19-treatment-guidance.html](https://www.uhcprovider.com/en/resource-library/news/Novel-Coronavirus-COVID-19/covid19-testing/covid19-treatment-guidance.html)

<sup>1</sup> Centers for Disease Control. *Using Telehealth to Expand Access to Essential Health Services during the COVID-19 Pandemic*, June 10, 2020. Available at: [www.cdc.gov/coronavirus/2019-ncov/hcp/telehealth.html#:~:text=Telehealth%20services%20help%20provide%20necessary,personnel%20\(HCP\)%20and%20patients](https://www.cdc.gov/coronavirus/2019-ncov/hcp/telehealth.html#:~:text=Telehealth%20services%20help%20provide%20necessary,personnel%20(HCP)%20and%20patients).

<sup>2</sup> ACOG. *Managing Patients Remotely: Billing for Digital and Telehealth Services*, October 19, 2020. Available at: [www.acog.org/practice-management/coding/coding-library/managing-patients-remotely-billing-for-digital-and-telehealth-services](https://www.acog.org/practice-management/coding/coding-library/managing-patients-remotely-billing-for-digital-and-telehealth-services).

<sup>3</sup> BMC Public Health. *The role of telehealth during COVID-19 outbreak: a systematic review based on current evidence*, August 2020. Available at: [www.ncbi.nlm.nih.gov/pmc/articles/PMC7395209/](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7395209/).

<sup>4</sup> Centers for Disease Control. *Using Telehealth to Expand Access to Essential Health Services during the COVID-19 Pandemic*, June 10, 2020. Available at: [www.cdc.gov/coronavirus/2019-ncov/hcp/telehealth.html#:~:text=Telehealth%20services%20help%20provide%20necessary,personnel%20\(HCP\)%20and%20patients](https://www.cdc.gov/coronavirus/2019-ncov/hcp/telehealth.html#:~:text=Telehealth%20services%20help%20provide%20necessary,personnel%20(HCP)%20and%20patients).

<sup>5</sup> Variation exists between fully-insured and self-insured plans. 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 (COMAR 10.25.16.02(B)(5)). 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 (COMAR 31.11.02.02(B)(8)).

## Practice Tips

Consider the following factors when implementing or scaling telehealth during the PHE.

- *Licensure* – Relaxation in licensing rules allow providers in good standing in another State to practice telehealth in Maryland. More information is available at: [mhcc.maryland.gov/mhcc/pages/hit/hit/documents/HIT\\_Telehealth\\_Providers\\_Flyer.pdf](https://mhcc.maryland.gov/mhcc/pages/hit/hit/documents/HIT_Telehealth_Providers_Flyer.pdf).
- *Data Privacy and Security* – Maintain good security hygiene to protect patient data, such as encryption (both in transit and at rest), authentication, and access control. More information is available at: [mhcc.maryland.gov/mhcc/pages/hit/hit/documents/HIT\\_Telehealth\\_Privacy\\_Security\\_Flyer.pdf](https://mhcc.maryland.gov/mhcc/pages/hit/hit/documents/HIT_Telehealth_Privacy_Security_Flyer.pdf).
- *Liability Insurance* – Contact the liability insurance carrier to verify which activities are covered and under what circumstances. More information is available at: [mhcc.maryland.gov/mhcc/pages/hit/hit/documents/HIT\\_Telehealth\\_Liability\\_Insurance\\_Flyer.pdf](https://mhcc.maryland.gov/mhcc/pages/hit/hit/documents/HIT_Telehealth_Liability_Insurance_Flyer.pdf).
- *Patient Engagement* – Engage patients and tailor communications with information and resources to meet their needs. More information is available at: [mhcc.maryland.gov/mhcc/pages/hit/hit/documents/HIT\\_Patient\\_Engagement\\_Flyer.pdf](https://mhcc.maryland.gov/mhcc/pages/hit/hit/documents/HIT_Patient_Engagement_Flyer.pdf).

## Additional Resources

- Permanent Expansion of Certain Medicare Telehealth Services  
[www.cms.gov/newsroom/press-releases/trump-administration-finalizes-permanent-expansion-medicare-telehealth-services-and-improved-payment](https://www.cms.gov/newsroom/press-releases/trump-administration-finalizes-permanent-expansion-medicare-telehealth-services-and-improved-payment)
- OCR Announcement  
[www.hhs.gov/about/news/2020/03/17/ocr-announces-notification-of-enforcement-discretion-for-telehealth-remote-communications-during-the-covid-19.html](https://www.hhs.gov/about/news/2020/03/17/ocr-announces-notification-of-enforcement-discretion-for-telehealth-remote-communications-during-the-covid-19.html)
- HHS Tips for Providing Telehealth Services During COVID-19  
[www.hhs.gov/coronavirus/telehealth/index.html](https://www.hhs.gov/coronavirus/telehealth/index.html)
- MHCC Telehealth Virtual Resource Center  
[mhcc.maryland.gov/mhcc/Pages/hit/hit\\_telemedicine/hit\\_telemedicine\\_virtual\\_resource.aspx](https://mhcc.maryland.gov/mhcc/Pages/hit/hit_telemedicine/hit_telemedicine_virtual_resource.aspx)



### Questions?

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