

## MEMORANDUM

**To:** Justine Springer and Eva Lenoir  
**CC:** Alyssa Brown and Nancy Brown  
**From:** Laura Spicer, Charles Betley, and Brenna Tan  
**Date:** January 9, 2019  
**Re:** MCO Reimbursement Policies for Telehealth in Schools

---

### Introduction

At the request of the Maryland Health Care Commission (MHCC), the Maryland Department of Health (MDH) distributed a list of questions about reimbursement policies for telehealth in schools to each of the nine Medicaid managed care organizations (MCOs). The responses will inform deliberations of MHCC's School-Based Telehealth workgroup. MDH collected responses and provided them to The Hilltop Institute. The purpose of this memorandum is to summarize the results for MHCC.

### Results

Eight of the nine MCOs responded to the survey, and summarized responses are presented below. At the request of MDH, individual MCO responses are masked.

- 1. What are your organizations policies regarding reimbursement for services delivered in a school?**
  - One MCO responded that they reimburse for telehealth services in schools the same way that they reimburse other providers.
  - One responded that they pay for services in schools delivered by recognized school-based health centers (SBHCs).
  - Six MCOs responded that they reimburse SBHCs in accordance with MDH's SBHC Provider Manual.<sup>1</sup> Several added clarification that reimbursement is based on the applicable fee schedule or contracted/negotiated rate. Several also clarified that SBHC services are self-referral services. Hilltop Note: this manual applies to billing for all Medicaid SBHC services, both MCO and fee-for-service.

---

<sup>1</sup> See [https://mmcp.health.maryland.gov/SiteAssets/pages/Provider-Information/SBHC\\_Provider\\_Manual\\_05.24.2018.pdf](https://mmcp.health.maryland.gov/SiteAssets/pages/Provider-Information/SBHC_Provider_Manual_05.24.2018.pdf)

**2. What are your organizations policies regarding reimbursement for telehealth for services delivered within a school, including any particular policies regarding services delivered within a SBHC?**

- All MCOs indicated that they follow MDH’s telehealth program policies/regulations. Some also referenced the telehealth section of MDH’s SBHC Provider Manual. None of the MCOs offered any additional policies beyond MDH’s requirements.
- One MCO commented that they currently do not have any SBHC requests to provide telehealth services. Hilltop Note: this statement is consistent with our Medicaid data analysis.

**3. What services are reimbursed in schools, including any particular reimbursement of services delivered within a SBHC?**

- One MCO did not answer this question.
- Four MCOs reported that they follow the SBHC Provider Manual. Pages 16-23 list the services in which SBHCs may bill. Hilltop Note: these include:
  - Primary care services
  - Healthy Kids Early and Periodic Screening, Diagnosis, and Treatment (EPSDT) services
  - Vaccines
  - Laboratory and pathology services
  - Family planning
  - Telehealth

- Two MCOs indicated that they reimburse SBHCs for the same services as would be provided in a primary care physician’s (PCP’s) office.
- One MCO misinterpreted the question and offered the following response: “Services provided through telehealth are subject to the same program restrictions, pre-authorizations, limitations and coverage that exist for the service when provided in-person.”

**4. What are requirements that must be met in order for your organization to reimburse for services in schools both in-person and via telehealth, including within a SBHC?**

- **Registration requirements**
- **Types of providers**
- All MCOs referenced the requirements in the SBHC Provider Manual/MDH telehealth program, indicating that providers must register with the MDH telehealth program.
- One MCO also commented that the distant site provider must also be in the MCO’s network.

**5. Are there differences in coverage for services delivered via telehealth versus in-person in schools or SBHCs?**

- All MCOs responded “No.” Two clarified that that they follow the SBHC Provider Manual.
- 6. Are there particular services or categories of service that are eligible or ineligible for telehealth in your policies?**
- Six MCOs stated that they cover the services listed in MDH’s telehealth program policies/SBHC provider manual. Some listed out the services that are excluded in MDH regulations.
  - Two MCOs noted that behavioral health services are carved out of the MCO benefit package, and these services should be referred to Beacon Health Options, the state’s behavioral health administrative services organization (ASO). Hilltop Note: This would apply to all MCOs. Dental services are also carved out.
- 7. Do you reimburse telehealth originating site fees? Is this done as a self-referral service?**
- Seven MCOs indicated that they do reimburse originating site visits. One indicated that they do not.
  - One MCO also noted that they have yet to receive any provider bill for the originating site fee to date.
  - Five MCOs indicated self-referral; the remaining three did not answer this portion of the question.
- 8. Is there a way to know (through billing process or otherwise) if a distant site provider is billing for a service where the recipient is in a school or SBHC?**
- Five MCOs referred to the Q-codes and GT modifiers described in MDH’s telehealth program policies.
  - Two MCOs commented that they have not received any bills for telehealth services in schools.
  - Two MCOs also referenced the SBHC provider manual, indicating that SBHCs must include a place of service code of 03.
- 9. Is pre-approval (pre-authorization) required for telehealth services?**
- Six MCOs responded “No.” One MCO commented that SBHC services are self-referral. Hilltop Note: this is essentially a response of “No.” One also clarified that telehealth services are subject to the same program restrictions and limitations that exist for the service when provided in person.
  - One MCO stated that they require prior authorization in accordance with MDH’s telehealth program requirements.

## **Summary**

In response to most questions, the MCOs referred us back to MDH's telehealth program policies and the MDH SBHC Provider Manual. Consistent with Hilltop's data analysis, we did learn from two MCOs that they have not been billed for any telehealth services from schools.

Please let us know if you have any further questions.