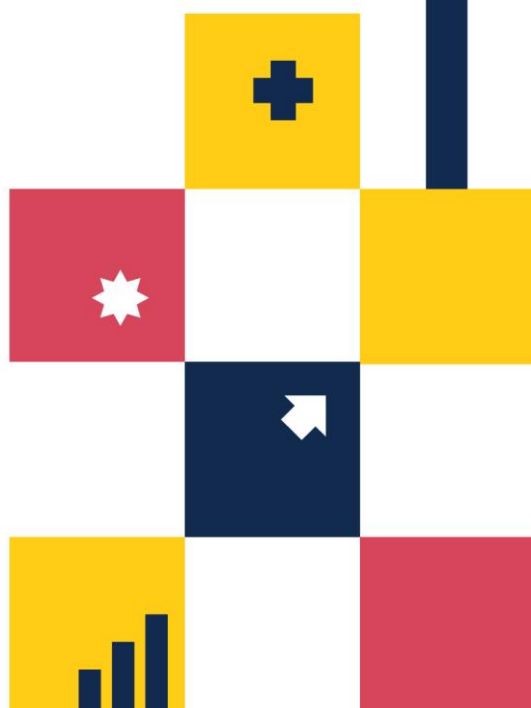


Telehealth Studies

*Preserve Telehealth Access Act of 2023
Behavioral Health Care – Treatment
and Access*

Data Supplement

DRAFT – October 17, 2024



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BACKGROUND

Chapter 382 (Senate Bill 534), *Preserve Telehealth Access Act of 2023* and Chapter 291 (House Bill 1148), *Behavioral Health Care - Treatment and Access (Behavioral Health Model for Maryland)* of the 2023 Laws of Maryland require the Maryland Health Care Commission (“MHCC”) to study and make recommendations regarding the delivery of somatic and behavioral health services through audiovisual and audio-only telehealth technologies. The study included the following elements:

- ▶ Determine if it is more or less costly for health care providers to deliver health care services through telehealth;
- ▶ Determine if the delivery of health care services through telehealth requires more or less clinical effort on the part of the health care provider;
- ▶ Identify the aspects of telehealth that are subject to overuse or underuse or yield greater or lower value to help inform the debate on payment parity; and
- ▶ Assess the adequacy of reimbursement for behavioral health services delivered in-person and by telehealth.

Milliman, Inc. (“Milliman”) was competitively selected to research the study elements and developed actuarial models to examine telehealth and in-person reimbursement rates for services delivered by behavioral health and primary care providers. Milliman prepared two Technical Reports that are available on the MHCC website;¹ data summaries are included in this supplement.

¹ Available at: mhcc.maryland.gov/mhcc/pages/hit/hit_telemedicine/hit_telemedicine_telehealth_studies.aspx.



SECTION 1: TELEHEALTH AND IN-PERSON REIMBURMENTS

The following table presents the relative reimbursement level of audiovisual and audio-only telehealth services for commercial payers in urban areas in Maryland. For more information, see *Technical Report 1*.

Commercial Payers – Maryland Urban Areas, 2023												
Provider Category	# of Services				Allowed Amount (\$)				Total RVU			
	Audio Only	Audio Visual	In Person	Total	Audio Only	Audio Visual	In Person	Total	Audio Only	Audio Visual	In Person	Total
Behavioral Health Services												
No Family												
PCP	14	5,124	268,352	273,490	\$1,524	\$52,449	\$4,294,614	\$4,348,587	42.66	1,073.97	85,214.80	86,331.43
Not PCP	0	19,793	91,988	111,781	\$0	\$616,420	\$3,590,293	\$4,206,713	0.00	13,978.72	86,012.89	99,991.61
Total	14	24,917	360,340	385,271	\$1,524	\$668,869	\$7,884,907	\$8,555,300	42.66	15,052.69	171,227.69	186,323.04
Nongroup												
PCP	8	19,546	12,602	32,156	\$726	\$1,693,763	\$1,062,792	\$2,757,281	26.45	49,258.10	34,561.58	83,846.13
Not PCP	872	1,170,543	643,799	1,815,214	\$77,373	\$126,780,086	\$66,239,536	\$193,096,995	2,733.76	4,247,451.88	2,512,183.97	6,762,369.61
Total	880	1,190,089	656,401	1,847,370	\$78,099	\$128,473,849	\$67,302,328	\$195,854,276	2,760.21	4,296,709.98	2,546,745.55	6,846,215.74
Group												
PCP	0	102	68	170	\$0	\$2,106	\$3,120	\$5,226	0.00	75.98	53.62	129.60
Not PCP	0	10,785	13,087	23,872	\$0	\$477,526	\$500,622	\$978,148	0.00	7,730.41	10,267.10	17,997.51
Total	0	10,887	13,155	24,042	\$0	\$479,632	\$503,742	\$983,374	0.00	7,806.39	10,320.72	18,127.11
Total												
PCP	22	24,772	281,022	305,816	\$2,250	\$1,748,318	\$5,360,526	\$7,111,094	69.11	50,408.05	119,830.00	170,307.16
Not PCP	872	1,201,121	748,874	1,950,867	\$77,373	\$127,874,032	\$70,330,451	\$198,281,856	2,733.76	4,269,161.01	2,608,463.96	6,880,358.73
Total	894	1,225,893	1,029,896	2,256,683	\$79,623	\$129,622,350	\$75,690,977	\$205,392,950	2,802.87	4,319,569.06	2,728,293.96	7,050,665.89
Office/Outpatient Services												
PCP	33,522	303,403	2,999,955	3,336,880	\$2,643,920	\$32,624,005	\$372,144,415	\$407,412,340	77,942.32	821,610.14	10,075,736.44	10,975,288.90
Not PCP	43,663	389,041	3,033,145	3,465,849	\$3,298,442	\$43,716,018	\$381,337,196	\$428,351,656	86,013.88	1,180,872.72	10,364,678.31	11,631,564.91
Total	77,185	692,444	6,033,100	6,802,729	\$5,942,362	\$76,340,023	\$753,481,611	\$835,763,996	163,956.20	2,002,482.86	20,440,414.75	22,606,853.81
Behavioral Health and Office/Outpatient Services												
Total	78,079	1,918,337	7,062,996	9,059,412	\$6,021,985	\$205,962,373	\$829,172,588	\$1,041,156,946	166,759.07	6,322,051.92	23,168,708.71	29,657,519.70



Commercial Payers – Maryland Urban Areas, 2023

Continued...

Provider Category	Allowed Per RVU				% of In Person Allowed Per RVU		% of In Person RVU Per Service	
	Audio Only	Audio Visual	In Person	Average	Audio Only	Audio Visual	Audio Only	Audio Visual
Behavioral Health Services								
No Family								
PCP	\$35.72	\$48.84	\$50.40	\$50.37	NA	96.9%	NA	66.0%
Not PCP	\$0.00	\$44.10	\$41.74	\$42.07	NA	105.6%	NA	75.5%
Total	\$35.72	\$44.44	\$46.05	\$45.92	NA	101.6%	NA	71.1%
Nongroup								
PCP	\$27.45	\$34.39	\$30.75	\$32.89	NA	111.8%	NA	91.9%
Not PCP	\$28.30	\$29.85	\$26.37	\$28.55	107.3%	113.2%	80.3%	93.0%
Total	\$28.29	\$29.90	\$26.43	\$28.61	107.3%	113.2%	80.3%	93.0%
Group								
PCP	\$0.00	\$27.72	\$58.19	\$40.32	NA	47.6%	NA	94.5%
Not PCP	\$0.00	\$61.77	\$48.76	\$54.35	NA	126.7%	NA	91.4%
Total	\$0.00	\$61.44	\$48.81	\$54.25	NA	126.1%	NA	91.4%
Total								
PCP	\$32.56	\$34.68	\$44.73	\$41.75	NA	104.2%	NA	78.8%
Not PCP	\$28.30	\$29.95	\$26.96	\$28.82	107.3%	113.1%	80.3%	92.7%
Total	\$28.41	\$30.01	\$27.74	\$29.13	107.3%	112.9%	80.3%	92.4%
Office/Outpatient Services								
PCP	\$33.92	\$39.71	\$36.93	\$37.12	111.2%	109.6%	73.1%	75.1%
Not PCP	\$38.35	\$37.02	\$36.79	\$36.83	103.1%	105.4%	95.1%	91.2%
Total	\$36.24	\$38.12	\$36.86	\$36.97	107.3%	107.5%	83.7%	83.4%
Behavioral Health and Office/Outpatient Services								
Total	\$64.65	\$68.13	\$64.61	\$66.10	214.7%	220.4%	164.0%	175.8%

The following table present the relative reimbursement level of audiovisual and audio-only telehealth services for commercial payers in rural areas in Maryland. For more information, see *Technical Report 1*.

Commercial Payers – Maryland Rural Areas, 2023												
Provider Category	# of Services				Allowed Amount (\$)				Total RVU			
	Audio Only	Audio Visual	In Person	Total	Audio Only	Audio Visual	In Person	Total	Audio Only	Audio Visual	In Person	Total
Behavioral Health Services												
No Family												
PCP	0	346	19,822	20,168	\$0	\$3,977	\$304,894	\$308,871	0.00	90.56	6,139.54	6,230.10
Not PCP	0	1,120	6,943	8,063	\$0	\$30,256	\$275,149	\$305,405	0.00	788.08	6,927.43	7,715.51
Total	0	1,466	26,765	28,231	\$0	\$34,233	\$580,043	\$614,276	0.00	878.64	13,066.97	13,945.61
Nongroup												
PCP	0	227	371	598	\$0	\$21,748	\$44,149	\$65,897	0.00	606.27	1,385.72	1,991.99
Not PCP	155	67,286	64,390	131,831	\$10,873	\$7,072,355	\$6,428,262	\$13,511,490	434.11	245,566.73	246,739.13	492,739.97
Total	155	67,513	64,761	132,429	\$10,873	\$7,094,103	\$6,472,411	\$13,577,387	434.11	246,173.00	248,124.85	494,731.96
Group												
PCP	0	1	0	1	\$0	\$29	\$0	\$29	0.00	0.79	0.00	0.79
Not PCP	0	928	960	1,888	\$0	\$41,171	\$25,675	\$66,846	0.00	653.02	758.30	1,411.32
Total	0	929	960	1,889	\$0	\$41,200	\$25,675	\$66,875	0.00	653.81	758.30	1,412.11
Total												
PCP	0	574	20,193	20,767	\$0	\$25,754	\$349,043	\$374,797	0.00	697.62	7,525.26	8,222.88
Not PCP	155	69,334	72,293	141,782	\$10,873	\$7,143,782	\$6,729,086	\$13,883,741	434.11	247,007.83	254,424.86	501,866.80
Total	155	69,908	92,486	162,549	\$10,873	\$7,169,536	\$7,078,129	\$14,258,538	434.11	247,705.45	261,950.12	510,089.68
Office/Outpatient Services												
PCP	894	20,705	282,133	303,732	\$59,424	\$2,169,793	\$31,782,275	\$34,011,492	2,244.84	53,413.23	936,777.99	992,436.06
Not PCP	490	17,967	149,456	167,913	\$39,855	\$1,733,747	\$15,945,457	\$17,719,059	1,261.41	53,437.58	501,789.97	556,488.96
Total	1,384	38,672	431,589	471,645	\$99,279	\$3,903,540	\$47,727,732	\$51,730,551	3,506.25	106,850.81	1,438,567.96	1,548,925.02
Behavioral Health and Office/Outpatient Services												
Total	1,539	108,580	524,075	634,194	\$110,152	\$11,073,076	\$54,805,861	\$65,989,089	3,940.36	354,556.26	1,700,518.08	2,059,014.70

Commercial Payers – Maryland Rural Areas, 2023

Continued...

Provider Category	Allowed Per RVU				% of In Person Allowed Per RVU		% of In Person RVU Per Service	
	Audio Only	Audio Visual	In Person	Average	Audio Only	Audio Visual	Audio Only	Audio Visual
Behavioral Health Services								
No Family								
PCP	\$0.00	\$43.92	\$49.66	\$49.58	NA	88.4%	NA	84.5%
Not PCP	\$0.00	\$38.39	\$39.72	\$39.58	NA	96.7%	NA	70.5%
Total	\$0.00	\$38.96	\$44.39	\$44.05	NA	93.0%	NA	76.8%
Nongroup								
PCP	\$0.00	\$35.87	\$31.86	\$33.08	NA	112.6%	NA	71.5%
Not PCP	\$25.05	\$28.80	\$26.05	\$27.42	NA	110.5%	NA	95.2%
Total	\$25.05	\$28.82	\$26.09	\$27.44	NA	110.6%	NA	95.1%
Group								
PCP	\$0.00	\$36.71	\$0.00	\$36.71	NA	NA	NA	NA
Not PCP	\$0.00	\$63.05	\$33.86	\$47.36	NA	186.2%	NA	89.1%
Total	\$0.00	\$63.02	\$33.86	\$47.36	NA	186.2%	NA	89.1%
Total								
PCP	\$0.00	\$36.92	\$46.38	\$45.58	NA	94.3%	NA	81.4%
Not PCP	\$25.05	\$28.92	\$26.45	\$27.66	NA	110.5%	NA	94.8%
Total	\$25.05	\$28.94	\$27.02	\$27.95	NA	110.3%	NA	94.6%
Office/Outpatient Services								
PCP	\$26.47	\$40.62	\$33.93	\$34.27	94.1%	140.9%	84.5%	70.3%
Not PCP	\$31.60	\$32.44	\$31.78	\$31.84	NA	107.8%	NA	95.7%
Total	\$28.31	\$36.53	\$33.18	\$33.40	94.1%	132.2%	84.5%	77.1%
Behavioral Health and Office/Outpatient Services								
Total	\$53.36	\$65.48	\$60.20	\$61.35	94.1%	242.5%	84.5%	171.7%

SECTION 2: ANNUAL PROVIDER SPECIALTY UTILIZATION RATES AND REIMBURSEMENT RATIOS – 2019-2023

The following table presents utilization of in-person and telehealth services per 100,000 and reimbursement as a percent of the Medicare allowed amount by line of business for select provider specialties from 2019-2023. For more information, see *Technical Report 2*.

Annual Provider Specialty Utilization Rates and Reimbursement Ratios, 2019-2023												
Specialty	Commercial				Medicare Advantage				Managed Medicaid			
	In-person		Telehealth		In-person		Telehealth		In-person		Telehealth	
	Annual Utilization Per 100,000 Individuals	Average Reimbursement (Relative to MPFS)	Annual Utilization Per 100,000 Individuals	Average Reimbursement (Relative to MPFS)	Annual Utilization Per 100,000 Individuals	Average Reimbursement (Relative to MPFS) ¹	Annual Utilization Per 100,000 Individuals	Average Reimbursement (Relative to MPFS)	Annual Utilization Per 100,000 Individuals	Average Reimbursement (Relative to MPFS)	Annual Utilization Per 100,000 Individuals	Average Reimbursement (Relative to MPFS)
Addiction medicine	803	79%	911	82%	885	105%	244	110%	319	77%	125	80%
Clinical psychologist	20,246	82%	26,747	83%	4,476	89%	4,483	103%	9,187	81%	3,573	80%
Family practice	54,281	113%	10,331	123%	92,625	124%	20,204	113%	33,602	92%	2,908	89%
General practice	3,226	112%	586	104%	2,752	96%	215	104%	18,252	90%	2,934	88%
Hospitalist	980	105%	202	116%	2,502	115%	702	100%	432	93%	15	93%
Internal medicine	54,218	104%	11,431	114%	120,608	114%	25,519	110%	24,734	91%	4,884	88%
Licensed clinical social worker	17,021	101%	21,839	105%	8,966	116%	9,265	139%	14,466	107%	4,775	106%
Mental Health Counselor	*	*	*	*	*	*	*	*	7,294	89%	2,641	92%
Multispecialty clinic or group practice	139	91%	67	88%	208	99%	*	*	3,648	112%	1,084	103%
Neuropsychiatry	614	112%	542	114%	216	96%	210	98%	6,709	104%	1,619	95%
Nurse practitioner	37,354	102%	11,420	104%	52,140	108%	7,600	100%	16,969	108%	3,976	104%
Pediatric medicine	25,292	103%	3,411	117%	3,168	111%	407	118%	44,782	91%	5,259	88%
Physician assistant	8,939	117%	776	137%	22,080	116%	1,623	119%	2,783	116%	257	108%
Psych/Mental Health Facility	325	89%	273	89%	397	93%	115	77%	42,572	111%	14,081	102%
Psychiatry	7,683	105%	7,927	112%	6,669	102%	6,638	106%	5,170	91%	2,752	90%

Annual Provider Specialty Utilization Rates and Reimbursement Ratios, 2019-2023

Specialty	Commercial				Medicare Advantage				Managed Medicaid			
	In-person		Telehealth		In-person		Telehealth		In-person		Telehealth	
	Annual Utilization Per 100,000 Individuals	Average Reimbursement (Relative to MPFS)	Annual Utilization Per 100,000 Individuals	Average Reimbursement (Relative to MPFS)	Annual Utilization Per 100,000 Individuals	Average Reimbursement (Relative to MPFS) ¹	Annual Utilization Per 100,000 Individuals	Average Reimbursement (Relative to MPFS)	Annual Utilization Per 100,000 Individuals	Average Reimbursement (Relative to MPFS)	Annual Utilization Per 100,000 Individuals	Average Reimbursement (Relative to MPFS)
Psychologist (billing independently)	3,680	98%	4,015	100%	3,653	79%	979	88%	783	87%	254	82%
Public health or welfare agencies	22	167%	*	*	72	98%	*	*	1,424	106%	553	104%
Rehabilitation Agency	236	84%	181	84%	831	97%	42	89%	30,406	112%	10,220	101%
All Other Specialty	4,955	94%	3,314	96%	1,521	117%	434	125%	26,068	99%	8,496	91%
Total	240,013	103%	103,972	101%	323,768	114%	78,679	111%	289,601	99%	70,407	95%

Notes:

- Average reimbursement expressed as a percent of Medicare Physician Fee Schedule (MPFS)
- No data was available for Medicaid in 2023
- An asterisk (*) indicates utilization levels that are not credible (< 10 services per hundred thousand)

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