

## **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).<sup>1,2</sup> Variation in coverage for telehealth services exists across different payers and plan types.<sup>3</sup> Most states and private payers have largely followed federal telehealth policy changes. This include permanent changes, such as removing originating site and rural requirements for mental health and substance use services and allowing the delivery of audio-only telehealth services if certain conditions are satisfied (i.e., the patient is unable to use or does not consent to using audio-visual technology).<sup>4,5</sup> In December 2024, Congress extended the temporary waiver for originating and rural requirements for other services through March 31, 2025.<sup>6</sup>

#### **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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<sup>1</sup> The Department of Health and Human Services declared a PHE in January 2020. The PHE ended on May 11, 2023.

<sup>2</sup> 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.

<sup>3</sup> 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](https://mgaleg.maryland.gov/mgawebsite/laws/StatuteText?article=gin&section=15-139&enactments=false).

<sup>4</sup> 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](https://www.cms.gov/files/document/mm13887-medicare-physician-fee-schedule-final-rule-summary-cy-2025.pdf).

<sup>5</sup> Department of Health and Human Service. Telehealth policy changes after the COVID-19 public health emergency. Available at: [telehealth.hhs.gov/providers/telehealth-policy/policy-changes-after-the-covid-19-public-health-emergency#permanent-medicare-changes](https://telehealth.hhs.gov/providers/telehealth-policy/policy-changes-after-the-covid-19-public-health-emergency#permanent-medicare-changes).

<sup>6</sup> American Relief Act, 2025, Sec 3207. Extension of Certain Telehealth Flexibilities.

## Government Payers

	Maryland Medicaid	Medicare
<b>Eligibility</b>		
<b>Providers</b>	<ul style="list-style-type: none"> <li>As permitted by applicable licensing board               <ul style="list-style-type: none"> <li><a href="#">Maryland Medicaid Synchronous Telehealth Policy Guide</a>, Page 2</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Centers for Medicare and Medicaid Services (CMS) Telehealth Services</a>, Pages 3-4</li> <li><a href="#">Medicare Physician Fee Schedule Final Rule Summary: CY 2025</a>, Pages 2-3</li> </ul>
<b>Locations</b>	<ul style="list-style-type: none"> <li>Originating and hub/distant sites               <ul style="list-style-type: none"> <li><a href="#">Maryland Medicaid Synchronous Telehealth Policy Guide</a>, Page 2</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Originating Site               <ul style="list-style-type: none"> <li><a href="#">Centers for Medicare and Medicaid Services (CMS) Telehealth Services</a>, Pages 3-4</li> </ul> </li> <li>Distant Site               <ul style="list-style-type: none"> <li><a href="#">Centers for Medicare and Medicaid Services (CMS) Telehealth Services</a>, Pages 3-4</li> </ul> </li> </ul>
<b>Technology</b>	<ul style="list-style-type: none"> <li><a href="#">Maryland Medicaid Synchronous Telehealth Policy Guide</a>, Pages 2-3</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Telehealth</a></li> <li><a href="#">eVisit</a></li> <li><a href="#">Virtual Check In</a></li> </ul>
<b>Billing</b>		
<b>Originating Site</b>	<ul style="list-style-type: none"> <li><a href="#">Maryland Medicaid Synchronous Telehealth Policy Guide</a>, Page 2</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Centers for Medicare and Medicaid Services (CMS) Telehealth Services</a>, Pages 4-5</li> </ul>
<b>Services</b>	<ul style="list-style-type: none"> <li><b>Audio-Visual</b>, “GT” modifier               <ul style="list-style-type: none"> <li><a href="#">Maryland Medicaid Synchronous Telehealth Policy Guide</a>, Page 3</li> </ul> </li> <li><b>Audio-Only</b>, “-UB” modifier               <ul style="list-style-type: none"> <li><a href="#">Maryland Medicaid Synchronous Telehealth Policy Guide</a>, page 3</li> <li><a href="#">Guidance on the Continuation of Telehealth for ABA Services</a></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li><b>Audio-visual and Audio-only</b>, POS 02 and GT-modifier (critical access hospitals only)               <ul style="list-style-type: none"> <li><a href="#">List of Medicare Telehealth Services Payable under Physician Fee Schedule</a></li> </ul> </li> <li><b>Audio-Only</b> <ul style="list-style-type: none"> <li><a href="#">List of Medicare Telehealth Services Payable under Physician Fee Schedule</a></li> <li>Not related to a medical visit within the previous 7 days</li> <li>Does not lead to a medical visit within the next 24 hours</li> </ul> </li> <li><b>E-Visit (online portal)</b> <ul style="list-style-type: none"> <li>Patient initiated</li> <li>Occurs over a maximum of 7 days</li> </ul> </li> </ul>

	Maryland Medicaid	Medicare
	<b>Billing</b>	
<b>Cost-Sharing</b> (Copayments, Deductibles, Coinsurance)	<ul style="list-style-type: none"> <li>• <a href="#">Maryland Medicaid Synchronous Telehealth Policy Guide</a>, Page 1</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Medicare Telehealth</a></li> </ul>
	<b>Additional Resources</b>	
	<ol style="list-style-type: none"> <li>1. <a href="#">Maryland Medicaid Telehealth Program Website</a></li> </ol>	

## Private Payers

	Aetna	CareFirst	Cigna	Kaiser	UnitedHealthcare
<b>Payer Sponsored Telehealth Program (through third-party vendor)</b>	<ul style="list-style-type: none"> <li><a href="#">Telehealth services</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">CareFirst CloseKnit</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Cigna Virtual Care</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Convenient ways to get care</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">24/7 Virtual Visit</a></li> </ul>
<b>Eligibility</b>					
<b>Providers</b>	<ul style="list-style-type: none"> <li><a href="#">Aetna Availity Portal</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">CareFirst Provider Manual</a>, Page 47 <a href="#">CareFirst Healthcare Providers Webpage</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Cigna Reimbursement Policy Virtual Care</a>, Pages 1-4</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Kaiser Community Provider Portal</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Telehealth and Telemedicine Policy</a>, Page 3</li> </ul>
<b>Locations</b>	<ul style="list-style-type: none"> <li><a href="#">Aetna Availity Portal</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Medical Policy Reference Manual</a>, <a href="#">Medical Policy Operating Procedure</a>, <a href="#">2.01.072A Telemedicine</a>, <a href="#">Pages 1-2</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Cigna Reimbursement Policy Virtual Care</a>, Pages 1-4</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Kaiser Community Provider Portal</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Telehealth and Telemedicine Policy</a>, Page 2-3</li> </ul>
<b>Billing</b>					
<b>Technology</b>	<ul style="list-style-type: none"> <li><a href="#">Aetna Availity Portal</a></li> </ul>	<ul style="list-style-type: none"> <li>Interactive audio, video, or other electronic media               <ul style="list-style-type: none"> <li><a href="#">Medical Policy Reference Manual</a>, <a href="#">Medical Policy Operating Procedure</a>, <a href="#">2.01.072A Telemedicine</a>, <a href="#">Page 1</a></li> </ul> </li> <li><i>Audio only consultations using 99056</i> <ul style="list-style-type: none"> <li><a href="#">CareFirst Healthcare Providers Webpage</a></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Cigna Reimbursement Policy Virtual Care</a>, Pages 1-4</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Kaiser Community Provider Portal</a></li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Telehealth and Telemedicine Policy</a>, Page 3</li> </ul>

	Aetna	CareFirst	Cigna	Kaiser	UnitedHealthcare
<b>Billing</b>					
<b>Services</b>	<b>Audio-visual</b> <ul style="list-style-type: none"> <li>Somatic</li> <li><a href="#">Aetna Availability Portal</a></li> <li>Behavioral Health</li> <li><a href="#">Approved Behavioral Health Telemedicine Services</a></li> </ul> <b>Audio only</b> with modifiers - 93 or FQ <ul style="list-style-type: none"> <li><a href="#">Aetna Availability Portal</a></li> </ul>	<b>Audio-visual</b> , GT or 95 Modifier and POS 02 <b>Audio-only</b> adds CPT 99056 <ul style="list-style-type: none"> <li><a href="#">CareFirst Procedure Code/Modifier/Place of Service Instructions for Telemedicine Claims During Covid-19 Public Health Emergency</a></li> </ul>	<b>Audio-visual</b> , HCPCS modifier-GT or CPT modifier-95 <b>Audio Only</b> , CPT modifiers - 93 and FQ <ul style="list-style-type: none"> <li><a href="#">Cigna Reimbursement Policy Virtual Care</a>, Pages 4-11</li> </ul>	<b>Audio-visual</b> , GT or 95 modifier or POS 02 or 10 <b>Audio-only</b> , GQ modifier or POS 02 or 10 <ul style="list-style-type: none"> <li><a href="#">Kaiser Community Provider Portal</a></li> </ul>	<b>Audio-visual</b> , POS 02 or 10 <b>Audio-only</b> , with POS 02 or 10 and 93 <ul style="list-style-type: none"> <li><a href="#">Communication Technology-Based Services and Remote Physiologic Monitoring Eligible Codes</a></li> <li><a href="#">Optum Provider Express Virtual Visits (Behavioral Health)</a></li> </ul>
<b>Additional Resources</b>					
<b>Resources</b>		<ul style="list-style-type: none"> <li><a href="#">Telemedicine Guidelines</a></li> </ul>			

## Questions

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