



Maryland  
Hospital Association

August 6, 2020

Tricia Roddy  
Acting Director, Maryland Medicaid  
Director, Innovation, Research, and Development  
Maryland Medicaid Program  
Maryland Department of Health  
201 W. Preston Street  
Baltimore, MD 21201-2399

**Re: Coverage of Telehealth Services by Maryland Medicaid**

Dear Ms. Roddy:

While we are thankful the federal public health emergency (PHE), which was slated to end July 25, was extended for 90 days, Maryland hospitals continue to explore all possible avenues to ensure hospitals and providers remain empowered to deliver safe, effective care. As we see during the COVID-19 pandemic, telehealth is essential to care for patients, while balancing unprecedented unknowns regarding the novel contagion and public health concerns. Maryland hospitals appreciate the state's efforts to expand telehealth services for Maryland Medicaid enrollees during the pandemic via the Governor's executive orders and corresponding directives from the Health Secretary.

What began as a measure to limit COVID-19 spread is the next step in patient-centered access to care. Practitioners and patients overwhelmingly support the development of telehealth as a standard modality for delivery across several levels of care. Therefore, Maryland hospitals are dedicated to working with Maryland Medicaid to make expanded coverage for telehealth services permanent after declared federal and state emergencies end.

**Benefits of Telehealth**

Hospitals adopted telehealth and virtual visits to expand access to care and remove barriers to health services for Marylanders before COVID-19. Telehealth can help address physician shortages, stretch health care capabilities, and improve efficiencies by opening the door to new delivery models that extend the reach of providers to meet patients where they are. For patients with immunocompromised conditions or socioeconomic barriers—such as a lack of transportation—traveling to appointments is difficult, leading to treatment interruptions and noncompliance. Allowing services to be provided in a patient's location can result in immediate treatment and adherence recommendations based on seeing the patient's environment.

Telehealth also supports caretakers, who put their lives on hold to bring their loved ones to the care they need.<sup>1</sup> Telehealth fully meets patients' needs without sacrificing their caretaker's invaluable time for higher education or work allowing some families to break the cycle of generational poverty. Hospitals prioritize equity and access to care. Telehealth has invaluable benefits for vulnerable populations and communities, so long as strong policies, appropriate quality standards, and system infrastructure are established.

Maryland relaxed quarantine rules, yet patients are still hesitant to obtain in-person routine medical care, such as check-ups and health maintenance appointments, due to fears of exposure. Providers must be able to offer, and be adequately reimbursed for, these critical services via telehealth to avoid adverse health outcomes for Marylanders.

### **Continuation of Existing Telehealth Flexibilities**

The Maryland Hospital Association (MHA) worked with Maryland Medicaid well before the COVID-19 pandemic to expand telehealth services to deliver behavioral health services to patients' homes. With the passage of Senate Bill 502 (SB 502), which extends this coverage to Medicaid enrollees, we look forward to continuing and furthering our partnership with Maryland Medicaid on this effort.

Yet, beyond the language of SB 502, patients and practitioners have embraced many of the flexibilities offered during the state and federal declared emergencies. To that end, MHA urges Maryland Medicaid to make coverage and reimbursement for appropriate somatic and behavioral telehealth care services permanent by promulgating regulations to ensure telehealth services can be delivered to patient's at their location and remove conditions or criteria for remote patient monitoring. In addition, we urge Maryland Medicaid to work with the Centers for Medicare & Medicaid Services and the Department of Health and Human Services to maintain coverage for audio-only visits and address the need for revised compliance guidance related to the Health Insurance Portability and Accountability Act.

Maryland hospitals are grateful Maryland Medicaid ensured telehealth flexibilities and waivers. During this uncertain time, MHA is certain about the lasting power and benefits of telehealth on patient care. We look forward to working closely with you to cultivate thoughtful, lasting, and meaningful telehealth policies for the good of all Marylanders.

Sincerely,



Maansi K. Raswant  
VP, Policy

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<sup>1</sup> Chiang LC, Chen WC, Dai YT, Ho YL. The effectiveness of telehealth care on caregiver burden, mastery of stress, and family function among family caregivers of heart failure patients: A quasi-experimental study. [www.ncbi.nlm.nih.gov/pubmed/22633448](http://www.ncbi.nlm.nih.gov/pubmed/22633448).