



MARYLAND Department of Health

Larry Hogan, Governor · Boyd Rutherford, Lt. Governor · Dennis Schrader, Secretary

September 12, 2017

Jennifer Witten
Director of Government Relations
Maryland Hospital Association
6820 Deerpath Road
Elkridge, MD 21075

Dear Ms. Witten,

Thank you for submitting comments regarding the proposed regulatory changes to COMAR 10.09.49 Telehealth Services.

Your comment urges the Department to remove restrictions as SB 570/HB 658 proposed to require. However, the bill did not pass and is not law. As such, Maryland Medicaid retained the authority to administer the telehealth program and identify appropriate providers eligible for reimbursement for services delivered via telehealth. These restrictions are a critical element to ensure appropriate use of telehealth.

Your letter also urges the Maryland Medicaid to remove restrictions on the use of store and forward. As stated at 10.09.49.03(B)(16), radiology is covered and paid for under 10.09.02.07. Maryland Medicaid includes teleradiology within radiology. COMAR 10.09.49 Telehealth Services covers hub and spoke delivery model as the only telehealth model currently covered in Maryland.

Lastly, your letter requests Maryland Medicaid remove prior authorization requirements for behavioral health services. Maryland Medicaid cannot through these regulations remove prior authorization requirements. Such restrictions would need to be removed from COMAR 10.09.80.06 and 10.09.59.08.

For up-to-date information about Maryland Medicaid's Telehealth Program, please visit health.maryland.gov/telemedicine or email health.telemedicineinfo@maryland.gov.

Sincerely,

Molly Marra
Deputy Director, Health Services Policy
Maryland Medicaid