

# BEYOND COVID-19

Telehealth Policy in  
Maryland's  
HealthChoice  
Program

*Prepared by  
Maryland Managed Care Organization Association  
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# MMCOA



MARYLAND MCO ASSOCIATION

# Telehealth: Past, Present, and Future

The COVID-19 pandemic gave rise to a sharp increase in the number of Medicaid HealthChoice members accessing care through telehealth services. However, even before the novel coronavirus, telehealth utilization was growing. Following Governor Hogan's March 5, 2020 State of Emergency declaration, the Secretary of Health temporarily expanded the definition of a telehealth originating site to include a participant's home or any other secure location as approved by the participant and the provider for purpose of delivery of Medicaid-covered services. This declaration applies to services delivered to a Medicaid member via Fee-For-Service (FFS) or through a HealthChoice Managed Care Organization (MCO). This regulatory expansion ensured that Medicaid members could access health care services in their own home or other secure location while mitigating possible exposure to COVID-19. This, along with numerous other flexibilities granted to MCOs to ensure the continued care of our members, has enabled those enrolled in the Medicaid HealthChoice program the ability to access quality care while the State of Emergency remains in effect. These expansions will remain in effect until further notice by Maryland Department of Health, but now is the time to begin thinking about what the delivery of telehealth services will look like post-COVID-19. As policymakers begin these discussions, special consideration needs to be given to the unique needs of Marylanders served by HealthChoice MCOs, including technological, transportation, geographic, and translation/linguistic concerns.

## Willingness to Use Telehealth Services

In 2019, only 11% of consumers were likely to use telehealth services. In 2020, that number now stands at 76%.

*McKinsey COVID-19 Consumer Survey, April 27, 2020*

## Barriers to Health Choice Telehealth Delivery

According to a 2019 Pew Research Center survey, only 56% of households with an income of less than \$30,000/year have internet access, compared to 94% of households with an income of \$100,000/year or more.

*Pew Research Center, 2019*

# Recommendations for State Telehealth Policy

When developing and implementing policies governing the delivery of telehealth services post-COVID-19 State of Emergency, the Maryland Managed Care Organization Association (MMCOA), comprised of the nine MCOs serving the 1.5 million Marylanders enrolled in the HealthChoice Program, respectfully requests that the considerations listed below be incorporated into those policies.

- MMCOA supports the ongoing collection and analysis of clinical data as telehealth policy is developed to ensure that implemented policies result in positive health outcomes for HealthChoice members.
- MMCOA supports the elimination of "originating site" requirements, allowing reimbursement via telehealth delivery.
- MMCOA supports retaining and strengthening certain regulatory flexibilities and oversight surrounding audio-only delivery of telehealth services, provided that the delivery is clinically appropriate and that MCOs and health care providers have discretion in determining effectiveness of this modality, given the medical needs of the patient and the services delivered.
- MMCOA supports retaining certain flexibilities that allow providers to be reimbursed for telehealth services, if the services delivered are within the provider's scope of practice and that the provider maintains a current, valid, and unrestricted license.
- MMCOA supports the reinstating of technology standards that require providers to use HIPAA-compliant technology in the delivery of telehealth services, a requirement that was relaxed by the U.S. Department of Health and Human Services, Office for Civil Rights (OCR) during the federal Public Health Emergency. To ensure patient privacy and system interoperability, resulting in safer delivery of care and better patient outcomes, delivery platforms must be HIPAA-compliant.
- MMCOA supports the Maryland Department of Health, in collaboration with MCOs and other stakeholders, to develop tools and processes by which fraud can be detected in the delivery of telehealth services.
- MMCOA supports allowing telehealth visits, as described in the policy recommendations above, to be counted as services provided to meet HEDIS requirements for health plans as currently permitted by NCQA.

# **MMCOA: A partner to our members, policymakers, and the State of Maryland**

**The Maryland MCO Association (MMCOA) is the trade association for Maryland's managed care organizations. The Association consists of nine member MCOs, and our aim is to educate Marylanders about the unique role that MCOs play in controlling costs and providing excellent health care. We do this by advocating for a more effective, integrated, and comprehensive Medicaid program to ensure access to affordable high-quality health care for all Medicaid enrollees.**

## *Our Members*

**Aetna Better Health**

**Amerigroup Maryland, Inc.**

**Jai Medical Systems**

**Kaiser Permanente - Mid-Atlantic States**

**Maryland Physicians Care**

**MedStar Family Choice, Inc.**

**Priority Partners MCO, Inc.**

**UnitedHealthcare of the Mid-Atlantic, Inc.**

**University of Maryland Health Partners/CareFirst BlueCross BlueShield**

**Community Health Plan Maryland**