



Asynchronous Telehealth Abortion Services for Medicaid Enrollees: Policy Chart

[Cat Duffy](#)

State	Definition of Store-and-Forward or Asynchronous Telehealth	Medicaid Coverage of Asynchronous Care?	Payment Parity for Asynchronous Care?	Can A Patient-Provider Relationship Be Established via Asynchronous Care?
AK ¹	<p>"Asynchronous: a store-and-forward, through transfer from one location to another, of recorded digital images, data, video, or sounds to allow a consulting provider to obtain information, analyze it, and report back to the rendering provider"</p> <p>See: 7 AAC 110.625</p>	<p>Only when it's used for consultations between providers.</p> <p>See: AK Medicaid FAQ Coverage of Telehealth Modalities</p>	<p>Yes but asynchronous care is restricted to consultations between providers which will preclude reimbursement for asynchronous TMAB.</p> <p>See: AK Medicaid FAQ Coverage of Telehealth Modalities</p>	<p>Likely No²</p> <p>There is no explicit Medicaid policy, but AK State Medical Board guidance indicates that physicians may not prescribe, dispense or administer "a prescription drug in response to an Internet questionnaire or electronic mail message to a person with whom the physician does not have a prior physician-patient relationship" which would likely effectively prohibit most asynchronous TMAB models.</p> <p>See: AK State Medical Board, Telemedicine Policies and Procedures</p>

State	Definition of Store-and-Forward or Asynchronous Telehealth	Medicaid Coverage of Asynchronous Care?	Payment Parity for Asynchronous Care?	Can A Patient-Provider Relationship Be Established via Asynchronous Care?
CA	<p>"Asynchronous store and forward: The transmission of a patient's medical information from an originating site to the health care provider at a distant site without the presence of the patient."</p> <p>See: CA Bus. & Prof. § 2290.5(a)(1); DHCS Telehealth Definitions Page</p>	<p>Yes, with caveats.</p> <p>See: DCHS Telehealth Policy Executive Summary; Telehealth Provider Manual, p. 1</p>	<p>Yes</p> <p>See: Telehealth Provider Manual, p. 4</p>	<p>No</p> <p>See: Telehealth Provider Manual, p. 3</p>
CT	<p>"Asynchronous" means any transmission to another site for review at a later time that uses a camera or other technology to capture images or data to be recorded.</p> <p>"Store and forward transfer" means the asynchronous transmission of a patient's medical information from an originating site to the telehealth provider at a distant site.</p> <p>See: Conn. Gen. Stat. § 19a-906a</p>	<p>No</p> <p>See: Provider Bulletin 2023-38</p>	<p>No</p>	<p>Unlikely</p> <p>HUSKY Health has no specific policy on the creation of patient-provider relationships but it no longer covers asynchronous care. Connecticut law does outline the conditions under which a provider may deliver services via telehealth and has no restrictions on new patients.</p> <p>See: Public Act 22-81</p>

State	Definition of Store-and-Forward or Asynchronous Telehealth	Medicaid Coverage of Asynchronous Care?	Payment Parity for Asynchronous Care?	Can A Patient-Provider Relationship Be Established via Asynchronous Care?
HI	<p>Hawaii has no specific definition but it defines telehealth as including "store and forward technologies" and "secure interactive and non-interactive web-based communication, and secure asynchronous information exchange, to transmit patient medical information, including diagnostic-quality digital images and laboratory results for medical interpretation and diagnosis, for the purpose of delivering enhanced health care services and information while a patient is at an originating site and the health care provider is at a distant site."</p> <p>See: Haw. Rev. Stat § 346-59.1(g); HB907</p>	<p>Yes</p> <p>See: Haw. Rev. Stat. § 346-59.1</p>	<p>No</p> <p>Payment parity only applies to synchronous telehealth modalities.</p> <p>See: Haw. Rev. Stat. § 346-59.1</p>	<p>Most likely</p> <p>Hawaii law allows a patient-provider relationship to be established via telehealth and has no restrictions. Since the state's definition of telehealth includes asynchronous care, we interpret this language as allowing the use of all modalities. However, the statute language is specific to physicians, which may be a barrier to advanced practice clinicians.</p> <p>See: Haw. Rev. Stat. § 453-1.3</p>

State	Definition of Store-and-Forward or Asynchronous Telehealth	Medicaid Coverage of Asynchronous Care?	Payment Parity for Asynchronous Care?	Can A Patient-Provider Relationship Be Established via Asynchronous Care?
IL	<p>Asynchronous Store and Forward Technology is defined as "the transmission of a patient's medical information from an originating site to the provider at the distant site. The provider at the distant site can review the medical case without the patient being present. An asynchronous telecommunication system in single media format does not include telephone calls, images transmitted via facsimile machines and text messages without visualization of the patient (electronic mail). Photographs visualized by a telecommunication system must be specific to the patient's medical condition and adequate for furnishing or confirming a diagnosis and/or treatment plan."</p> <p>See: IL Administrative Code § 140.403</p>	<p><u>Yes</u></p> <p>The flexibilities established under the public health emergency were indefinitely extended in May, 2023 and are still in place as of publication of this resource. However, it is not a permanent policy change and the permanent Medicaid policy is a major barrier to telehealth.</p> <p>See: Ill. Admin. Code Code 140.403(a); HFS Provider Notice (05/09/2023)</p>	<p><u>Yes</u></p> <p>Illinois generally has payment parity for covered services delivered via telehealth, although it does not specify modalities.</p> <p>See: Ill. Admin. Code 140.403(e); HFS Provider Bulletin (03/20/2020)</p>	<p>Unclear</p> <p>IL Medicaid does not have an established policy around use of telehealth to establish a provider-patient relationship. However, it does require an established relationship for reimbursement of "online patient portal or "E-visit" services," which it defines as "non-face-to-face patient-initiated communications using online patient portals." This could be applied to asynchronous care.</p> <p>See: Ill. Admin. Code. 140.403(e)</p>

State	Definition of Store-and-Forward or Asynchronous Telehealth	Medicaid Coverage of Asynchronous Care?	Payment Parity for Asynchronous Care?	Can A Patient-Provider Relationship Be Established via Asynchronous Care?
ME	<p>"Asynchronous encounters"" means the interaction or consultation between a patient and the patient's provider or between health professionals regarding the patient through a system with the ability to store digital information, including, but not limited to, still images, video, audio and text files, and other relevant data in one location and subsequently transmit such information for interpretation at a remote site by health professionals without requiring the simultaneous presence of the patient or the health professionals.</p> <p>"Store and forward transfers" means transmission of a patient's recorded health history through a secure electronic system to a health professional.</p> <p>See: Me. Rev. Stat. Title 22, § 3173-H</p>	<p>Yes, but only for established patients.</p> <p>See: MaineCare Benefits Manual Sec. 4 Telehealth, p. 4</p>	<p>Yes</p> <p>MaineCare generally has payment parity for covered services delivered via telehealth, although it does not specify modalities.</p> <p>See: MaineCare Chp 1 Section 4.07, p. 12</p>	<p>No</p> <p>See: MaineCare Benefits Manual Sec. 4 Telehealth, p. 4</p>

State	Definition of Store-and-Forward or Asynchronous Telehealth	Medicaid Coverage of Asynchronous Care?	Payment Parity for Asynchronous Care?	Can A Patient-Provider Relationship Be Established via Asynchronous Care?
MD	<p>Maryland has no definition but defines telehealth as including both "Synchronous and asynchronous interactions."</p> <p>See: MD. Code., Health-Gen. §15–141.2</p>	<p>Yes</p> <p>See: MD. Code., Health-Gen. §15–141.2</p>	<p>Yes, through June 2025</p> <p>See: MD. Code., Health-Gen. §15–141.2</p>	<p>Most Likely</p> <p>There is no specific Medicaid policy but Maryland allows a patient-provider relationship to be established via telehealth and has no restrictions. Since the state's definition of telehealth includes asynchronous care, we interpret this language as allowing the use of all modalities.</p> <p>See: MD Code, Health Occ. § 1-1002</p>
MA	<p>Massachusetts has no clear definition of asynchronous care, but it's definition of telehealth does include asynchronous modalities.</p> <p>See: MA Gen. Law. Chp 118E Sec. 79</p>	<p>Yes</p> <p>See: MassHealth All Provider Bulletin 374; MA Gen. Law. Chp 118E Sec. 79</p>	<p>Yes</p> <p>See: MassHealth All Provider Bulletin 374</p>	<p>Yes</p> <p>MassHealth policies have no modality-specific requirements or barriers to the use of telehealth to establish a patient-provider relationship.</p> <p>See: MassHealth All Provider Bulletin 374</p>

State	Definition of Store-and-Forward or Asynchronous Telehealth	Medicaid Coverage of Asynchronous Care?	Payment Parity for Asynchronous Care?	Can A Patient-Provider Relationship Be Established via Asynchronous Care?
MN	<p>Minnesota defines store-and-forward technology as "the asynchronous electronic transfer or transmission of a patient’s medical information or data from the originating site to a distant site for purposes of diagnostic and therapeutic assistance in the care of the patient. Medical information may include, but is not limited to, video clips, still images, X-rays, MRIs, EKGs, laboratory results, audio clips and text. The physician at the distant site reviews the case without the patient being present. Store-and-forward substitutes for an interactive encounter with the patient present; the patient is not present in real-time."</p> <p>See: MHCP Telehealth Services Provider Manual</p>	<p><u>Yes</u></p> <p>See: MHCP Telehealth Services Provider Manual</p>	<p><u>Most Likely</u></p> <p>Minnesota law instructs that "services or consultations delivered through telehealth shall be paid at the full allowable rate."</p> <p>See: Minn. Stat. § 256B.0625 subd. 3b</p>	<p><u>Yes</u></p> <p>There is no explicit MHCP policy but the Board of Medical Practice statute that governs the practice of telehealth allows a patient-provider relationship to be established via telehealth (but the language is specific to physicians).</p> <p>See: Minn. Stat. § 147.033</p>

State	Definition of Store-and-Forward or Asynchronous Telehealth	Medicaid Coverage of Asynchronous Care?	Payment Parity for Asynchronous Care?	Can A Patient-Provider Relationship Be Established via Asynchronous Care?
MT	<p>Montana has no established definition for asynchronous care or store-and-forward, however, a March provider bulletin outlined that "all Montana Medicaid covered services delivered via telemedicine/telehealth are reimbursable if" the services are medically necessary and clinically appropriate for telehealth delivery, follow all provider guidelines, and are not services required to be face to face as defined by the provider manual.</p> <p>See: DPHHS MT Healthcare Programs Notice (03/2020)</p>	<p><u>Yes</u></p> <p>See: DPHHS MT Healthcare Programs Notice (03/2020)</p>	<p><u>Yes</u></p> <p>Montana generally has payment parity for covered services delivered via telehealth, although it does not specify modalities.</p> <p>See: 53-6-122, MCA</p>	<p><u>Most Likely</u></p> <p>There is no explicit Montana Medicaid policy but guidance from the MT State Board of Medical Examiners allows for a provider-patient relationship to be established via telehealth generally if the standard of care allows it (however, the language is specific to physicians).</p> <p>See: MT State Board of Medical Examiners, Telemedicine Rules</p>

State	Definition of Store-and-Forward or Asynchronous Telehealth	Medicaid Coverage of Asynchronous Care?	Payment Parity for Asynchronous Care?	Can A Patient-Provider Relationship Be Established via Asynchronous Care?
<p>NJ</p>	<p>"Asynchronous store-and-forward' means the acquisition and transmission of images, diagnostics, data, and medical information either to, or from, an originating site or to, or from, the health care provider at a distant site, which allows for the patient to be evaluated without being physically present."</p> <p>See: NJ Rev Stat § 45:1-61</p>	<p><u>Yes</u></p> <p>See: NJ Rev Stat § 30:4D-6k; NJ S2559</p>	<p><u>Yes</u></p> <p>New Jersey generally has payment parity for covered services delivered via telehealth, although it does not specify modalities.</p> <p>See: NJ Rev Stat § 30:4D-6k; NJ S2559</p>	<p><u>Yes</u></p> <p>See: NJ Dept. of Human Services, NJFC Coverage and Reimbursement for Telemedicine and Telehealth Services, 2018</p>

State	Definition of Store-and-Forward or Asynchronous Telehealth	Medicaid Coverage of Asynchronous Care?	Payment Parity for Asynchronous Care?	Can A Patient-Provider Relationship Be Established via Asynchronous Care?
NM	<p>New Mexico defines store-and-forward as "the transference of digital images, sounds, or previously recorded video from one location to another; to allow a consulting provider to obtain information, analyze it, and report back to the referring physician providing the telemedicine consultation. Store-and-forward telemedicine includes encounters that do not occur in real time (asynchronous) and are consultants that do not require face-to-face live encounter between patient and telemedicine provider."</p> <p>See: N.M. Code R. § 8.310.2.12</p>	<p>Only when it's used for consultations between providers.</p> <p>See: N.M. Code R. § 8.310.2.12</p>	<p>Yes but asynchronous care is restricted to consultations between providers which will preclude reimbursement for asynchronous TMAB.</p> <p>See: N.M. Code R. § 8.310.2.12</p>	<p>No</p> <p>New Mexico Medicaid has no explicit policy on this but guidance from the New Mexico Medical Board prohibits prescribing, dispensing or administering drugs to new patients unless there is a synchronous audio-video interaction.</p> <p>See: N.M. Code R. § 16.10.8</p>

State	Definition of Store-and-Forward or Asynchronous Telehealth	Medicaid Coverage of Asynchronous Care?	Payment Parity for Asynchronous Care?	Can A Patient-Provider Relationship Be Established via Asynchronous Care?
<p>NY</p>	<p>"Store-and-forward technology involves the asynchronous, electronic transmission of health information of a NYS Medicaid member, in the form of patient-specific pre-recorded videos and/or digital images from a provider at an originating site to a telehealth provider at a distant site. Store-and-forward technology aids in diagnoses when live video contact is not readily available or not necessary."</p> <p>See: NYS Medicaid Update 02/2023</p>	<p>Only when it's used for consultations between providers.</p> <p>See: NYS Medicaid Update 02/2023</p>	<p>No</p> <p>Reimbursement for consultations provided via store and forward technology will be paid at 75% of the Medicaid fee for the service provided.</p> <p>See: NYS Medicaid Telehealth -- Billing Rules for Telehealth Services FAQ</p>	<p>Unclear</p> <p>NYS Medicaid has no explicit policy on this but we found no restrictions or policies that would be a barrier to using asynchronous care in establishing a patient-provider relationship.</p>

State	Definition of Store-and-Forward or Asynchronous Telehealth	Medicaid Coverage of Asynchronous Care?	Payment Parity for Asynchronous Care?	Can A Patient-Provider Relationship Be Established via Asynchronous Care?
OR	"Asynchronous" means not simultaneous or concurrent in time. For the purpose of this general rule, asynchronous telecommunication technologies for telemedicine or telehealth services may include audio and video, audio without video, client or member portal and may include remote monitoring. "Asynchronous" does not include voice messages, facsimile, electronic mail or text messages." See: OAR 410-120-1990	<u>Yes</u> See: ORS 414.723	<u>Yes</u> See: ORS 414.723	<u>Yes</u> See: OAR 410-120-1990

State	Definition of Store-and-Forward or Asynchronous Telehealth	Medicaid Coverage of Asynchronous Care?	Payment Parity for Asynchronous Care?	Can A Patient-Provider Relationship Be Established via Asynchronous Care?
RI	<p>""Store-and-forward technology" means the technology used to enable the transmission of a patient's medical information from an originating site to the healthcare provider at the distant site without the patient being present."</p> <p>See: RI Gen. Laws § 27-81-3</p>	<p>Yes</p> <p>See: RI Gen. Laws § 27-81-4</p>	<p>Not Likely</p> <p>Rhode Island payment parity only applies to in-network primary care providers, registered dietitian nutritionists, and behavioral health providers" which excludes the vast majority of abortion providers.</p> <p>See: RI Gen. Laws § 27-81-4</p>	<p>Yes</p> <p>Rhode Island Medicaid has no explicit policy but the Board of Medical Licensure issued guidance indicating telehealth can be used to establish a patient-provider relationship and has no modality restrictions.</p> <p>See: RI Board of Medical Licensure and Discipline, Guidelines for Telehealth Use</p>
VT	<p>"Store and forward" means an asynchronous transmission of a beneficiary's medical information from a health care professional to a provider at a distant site, through a secure connection that complies with HIPAA, without the beneficiary present in real time."</p> <p>See: VT Code of Rules 13 174 003</p>	<p>Only when it's used for consultations between providers.</p> <p>See: VT Code of Rules 13 174 003</p>	<p>Yes but asynchronous care is restricted to consultations between providers which will preclude reimbursement for asynchronous TMAB.</p> <p>See: VT Code of Rules 13 174 003</p>	<p>Yes</p> <p>Vermont Medicaid has no specific policy but the Board of Medical Practice allows patient-provider relationship to be established via synchronous or asynchronous telemedicine as long as the standard of care is met.</p> <p>See: Vermont Board of Medical Practice Policy on Telemedicine Use</p>

State	Definition of Store-and-Forward or Asynchronous Telehealth	Medicaid Coverage of Asynchronous Care?	Payment Parity for Asynchronous Care?	Can A Patient-Provider Relationship Be Established via Asynchronous Care?
WA	<p>Store and forward technology is the "use of an asynchronous transmission of a covered person's medical or behavioral health information from an originating site to the health care provider at a distant site which results in medical or behavioral health diagnosis and management of the covered person and does not include the use of audio-only telephone, facsimile, or email. "</p> <p>See: WA Telemedicine Policy Manual</p>	<p>Yes</p> <p>See: WAC 182-501-0300</p>	<p>Yes, with caveats</p> <p>Washington Medicaid has payment parity for all modalities but managed care organizations can negotiate different rates with hospitals, telemedicine companies, and some provider groups.</p> <p>See: WAC 182-501-0300; RCW 74.09.325</p>	<p>Yes</p> <p>Washington Medicaid has no explicit policy but the guidance from the state's WA Medical Commission allows a patient provider relationship to be established via telehealth.</p> <p>See: WA Medical Commission Policy statement on Telemedicine, 2021</p>

ENDNOTES

¹ Note: Alaska Medicaid also defines "patient-initiated online digital service" as the "evaluation, assessment, and management services of an established patient through a secure platform such as an electronic health record portal, secure electronic mail, or digital application when the patient is the originator of the interaction with the provider." (7 AAC 110.639). However, these services are limited to established patients.

² In Alaska, physician assistants are prohibited from prescribing, dispensing, or furnishing medication without an in-person examination unless there is a pre-existing provider-patient relationship.