

**From:** [Krisztina Ford](#)  
**To:** [HSD-madrules](#)  
**Date:** Tuesday, April 6, 2021 9:54:49 AM  
**Attachments:** [image001.jpg](#)

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Hi – below are our comments from All Faiths’ staff – thank you, kf

There are two things we would like to see clarified:

Section 1, a, xii establishes that the originating site may be the client’s home. This will also potentially complicate things if/when the primary payer does not accept the home as an originating site. We will not be able to bill the primary for the denial because the claims do not use the “home” location code, they use “telehealth.” (It will be the same issue as provisional providers except there will not be a modifier they can use to make the claims go through as primary.)

Also, the highlighted sentence below could use some clarification so that it is not misunderstood. If the home is the originating site and they will reimburse for the originating site, are they reimbursing us for providing the interactive system that the client uses in the home? Or are we not supposed to bill for the originating site if the location is not ours? Will the client be reimbursed for their computer/internet?

(d) Telemedicine providers: Reimbursement for professional services at the originating-site and the distant-site are made at the same rate as when the services provided are furnished without the use of a telecommunication system. **In addition, reimbursement is made to the originating-site for a real-time interactive audio/video technology telemedicine system fee** at the lesser of the provider’s billed charge, or the maximum allowed by MAD for the specific service of procedure.

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(she/her) [Why pronouns matter?](#)

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