



# Magellan Compliance Notebook

Magellan Behavioral Health of Pennsylvania, Inc. (Magellan) strives to be proactive and use education as a preventative tool to help ensure our members receive the highest quality of care through you, the provider. The Compliance Department at Magellan is committed to sending monthly e-mails to targeted providers regarding a Compliance-related subject.

*This e-mail communication is specific to your HealthChoices (Pennsylvania Medicaid) Contract with Magellan.*

This month, Magellan would like to remind Child and Adolescent Residential Treatment Facility (RTF) Providers about RTF Bed Hold and Therapeutic Leave Guidelines as well as communicate some additional parameters related to the reimbursement for these activities.

---

Magellan sent a similar communication to RTF providers in August, 2018, however we have continued to observe non-compliance with the Pennsylvania Medical Assistance (MA) Bulletins. As a reminder, Magellan aligns with [MA Bulletin 01-95-13 JCAHO-Accredited RTF Services](#); and [MA Bulletin 01-95-12 Mental Health Services Provided in a Non-JCAHO Accredited Residential Facility for Children under 21 Years of Age](#), which outline the guidelines for reimbursement of time spent in therapeutic leave and hospital reserve days while in placement at a RTF.

## ***Hospital Reserved Bed Days/ Bed Hold***

When a member is admitted for a continuous 24-hour period to an acute care general hospital, rehabilitation hospital or rehabilitation unit of an acute care general hospital, psychiatric hospital or psychiatric unit of an acute care general hospital and the child is expected to return to the RTF, Magellan will reimburse the RTF to reserve the bed for the child's return to the facility for one-third of the facility's per diem payment rate. Either the same or a comparable bed must be available for the recipient upon return to the facility.

Important reminders and guidelines regarding bed hold days:

- Payment for a hospital reserved bed day is one-third of the facility's per diem payment rate and is limited to 15 days per child per calendar year. Providers should bill the designated code on their contracts that reflects the Bed Hold rate.
- The 15-day per calendar year limit is cumulative and applies regardless of whether the child received continuous or intermittent treatment at one or more RTFs or was admitted to one or more hospitals or units during the calendar year.

- **Overnight visits to the emergency room are considered “hospital reserved/ bed hold days”. A RTF may not bill the full rate when a member does not sleep in the RTF due to an overnight or multiple nights spent in an emergency room or crisis center.**

### ***Therapeutic Leave***

Therapeutic leave is a period of absence from an institutional setting directly related to the treatment of the individual’s illness. The first day of therapeutic leave is defined as 12 to 24 hours of continuous absence from the facility, without staff presence, for therapeutic reasons, without regard to calendar day. Continuous absence for any portion of each additional 24-hour period for therapeutic reasons counts as an additional day of therapeutic leave. Therapeutic leave must be prescribed as a part of the child’s individual treatment program. It is to be used as part of a professionally developed and supervised individual plan of care designed to achieve the child’s discharge from the facility and return to the community at the earliest possible time. The RTF where the child is currently receiving treatment is responsible both clinically and fiscally for mental health services the child may require while on leave. The facility must also reserve the residential facility bed while the child is on compensable therapeutic leave.

### **Therapeutic leave in excess of 48 days per calendar year is not billable.**

In order to receive reimbursement from Magellan for therapeutic leave, the following documentation must be in the record:

- The physician’s or psychologist’s order for the therapeutic leave
- A description of the desired outcome
- The date and time the child went on therapeutic leave and when the child returned
- A written evaluation resulting from interviews with both the child and family or legal guardian after the leave period
- The evaluation shall describe the treatment objectives of the leave and the outcomes.
- The facility must report therapeutic leave usage when requesting prior approval for continued stay.

Due to the identification of some concerning practices, Magellan has enhanced our Policy specific to the reimbursement for Therapeutic Leave. Although these changes were previously communicated to providers in 2018, we have continued to observe non-compliance. Please note that violation of the below guidelines will result in potential recovery action effective June 1, 2019.

- **Therapeutic leave cannot exceed 4 nights/5 days per episode.**
  - **If the member does not return back to the RTF from a therapeutic leave, the date of discharge will be the date of the last night the member spent in the RTF and reimbursement will not be provided for that episode of leave.**
-

At Magellan, we will continue to educate our providers with updated MA Bulletins, Regulations and other pertinent information in order to ensure Compliance. Although providers are ultimately responsible for knowing and complying with all applicable regulations, we proactively engage providers on an ongoing basis to make sure they are aware of compliance related requirements and expectations. Medicaid Program Integrity is truly a collaborative effort between our providers, county customers, Magellan, BPI and other oversight agencies. The monthly e-mail blast topics are generated from audit results and trends; however, are also sent in response to recent Magellan policy updates; newly released or relevant MA Bulletins and Policy Clarifications; or Regulation changes. The intention is to afford our providers with as many resources as possible to combat FWA and reduce overpayments.

Thank you for your ongoing hard work and dedication to our members!

**Magellan of Pennsylvania's Compliance Team**

**O** 215-504-3967 | **F** 866-667-7744