

Magellan Compliance Notebook

January, 2014

Dear Providers:

Magellan Behavioral Health of Pennsylvania, Inc. (Magellan) strives on being proactive and using education as a preventative tool to provide our members the highest quality of care through you, the provider.

The Quality Improvement and Compliance Departments at Magellan have committed to sending monthly e-mails to providers on a Compliance related subject. This month, we'd like to share an **important update** that impacts all Case Management, Peer Support and Peer Recovery providers in Magellan's HealthChoices networks (ICM, RC, TCM, BCM, CTI, TIP, CPS, CRS etc). *Upon review of the below policy change, providers will be required to sign and return the attached attestation confirming their review and understanding of this communication.*

As most providers of case management and peer support/ recovery services recognize, the regulations and requirements concerning signed Encounter verification forms is limited and vague. As a result, there is a wide variety in agency policy governing this expectation. At a minimum, providers have been diligent with obtaining signed Encounters from members on a monthly basis, in which members attest that they received the prescribed service during the month in question. At best, providers require members to provide signature verification on all services received. Magellan's ongoing auditing practices and the continued expansion of fraud, waste and abuse oversight responsibilities have reinforced the need for consistent and comprehensive requirements in the attainment of signature verification for service encounters.

In determining how to be compliant with the existing PA MA regulations, providers may have asked themselves, "Why do we collect signed Encounters from members"? Encounter verification forms offer a check and balance process for an agency to ensure that services delivered in the community are done so as documented. As such, this mechanism for effect and control is best enforced by obtaining pertinent information which can verify the provision of services. Magellan's compliance oversight activities have identified multiple scenarios in which a member refuted having received services on a specific date; however the provider had a progress note to support the claim that was paid by Magellan. In this case, a signed Encounter verification form (if the service was provided face-to-face) would serve as support for a provider agency who had submitted a claim.

As a result, effective May 1, 2014, Magellan will require all providers of Case Management, Peer Support and Peer Recovery services (ICM, RC, TCM, BCM, CTI, TIP, CPS, CRS, etc) to obtain a signed Encounter verification form from the member for every face-to-face contact that results in a claim being submitted to Magellan. Providers will need to determine how they will implement and monitor this requirement; however at a minimum, the following information must be recorded: date of service, start and end time (the actual time in clock hours, not the duration; i.e. '2:00 PM-4:00 PM', not '2 hours') and the member or guardian's (if under 14) signature. It is expected that contracted providers sign this attestation form acknowledging the policy change within 30 days (by Friday, March

14, 2014). Regardless of Magellan's receipt of this attestation, however, the new expectations will begin May 1, 2014. Providers will be monitored against these expectations during routine and targeted audits from Magellan's Quality Improvement/ Compliance Departments. The signed Encounter verification forms must be part of the medical record at the time of the audit.

For questions regarding the new expectations, please contact your designated compliance representative:

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At Magellan, we will continue to educate our providers with updated MA Bulletins, Regulations and other pertinent information in order to ensure Compliance. Our members are our utmost priority and together, we can provide quality services through education, knowledge, and being a proactive advocate for our member population.

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

Magellan of Pennsylvania's Compliance Team

Visit us at: www.MagellanofPA.com