

# Magellan Compliance Notebook – February, 2017

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 communication is directed to **all** providers regarding their documentation of services rendered within the medical records (i.e. progress notes, assessments, evaluations, medication management notes, etc.).

Ongoing audits of providers by Magellan have identified consistent trends in documentation deficiencies. **The most notable and prevalent of these trends is the omission of the start and end times on notes, which is a requirement for all services.**

Per your licensure and enrollment with the state, providers are expected to be compliant with all regulatory requirements within the PA Code and applicable MA Bulletins, many of which outline documentation requirements. Adherence to the regulations is also outlined in Magellan's provider contracts.

In 2014, in an effort to align all the documentation requirements for various services/ programs and provide a consistent guideline, Magellan issued "*Documentation Standards*" to our provider network. The language was also added to Magellan's Pennsylvania HealthChoices (PAHC) Provider Handbook Supplement:

## ***Documentation***

*In addition to serving as a legal record of services rendered, the documentation within each member's health record serves many purposes. It allows healthcare professionals to evaluate and plan the patient's immediate treatment, and to monitor his/her healthcare over time; facilitates communication and continuity of care among the physicians and other healthcare professionals involved in the patient's care; ensures accurate and timely claims review and payment; promotes appropriate utilization review and quality of care evaluations; can be used*

*for research and education; and finally serves as evidence that the services were provided as billed to a payer. Magellan has established minimum record-keeping requirements which align with Pennsylvania Medical Assistance regulations. Specifically:*

- *The record shall be legible throughout.*
- *The record shall identify the patient on each page.*
- *Entries shall be signed and dated by the responsible licensed provider. Care rendered by ancillary personnel shall be counter signed by the responsible licensed provider.*
- *Alterations of the record shall be signed and dated.*
- *The record shall contain a preliminary working diagnosis as well as a final diagnosis and the elements of a history and physical examination upon which the diagnosis is based.*
- *Treatments as well as the treatment plan shall be entered in the record. Drugs prescribed as part of the treatment, including the quantities and dosages shall be entered in the record. If a prescription is telephoned to a pharmacist, the prescriber's records shall have a notation to this effect.*
- *The record shall indicate the progress at each visit, change in diagnosis, change in treatment and response to treatment*
- *The record shall contain the results, including interpretations of diagnostic tests and reports of consultations.*
- *The disposition of the case shall be entered in the record.*
- *The record shall contain documentation of the medical necessity of a rendered, ordered or prescribed service.*

*The documentation of treatment or progress notes for all services, at a minimum, must include:*

- *The specific services rendered;*
- *The date that the service was provided;*
- *The name(s) of the individual(s) who rendered the services;*
- *The place where the services were rendered;*
- *The relationship of the services to the treatment plan, specifically any goals, objectives and interventions;*
- *Progress at each visit, any change in diagnosis, changes in treatment and response to treatment; and*
- **The actual time in clock hours that services were rendered. For example: the recipient received one hour of psychotherapy. The medical record should reflect that psychotherapy was provided from 10:00 AM - 11:00 AM.**

Despite ongoing efforts to communicate these requirements to providers, Magellan continues to observe a consistent trend of non-adherence which results in retractions for services rendered. The most common error is the lack of inclusion of both a start and end time of the session on the progress note/ assessment/ med note. Some important reminders about documenting start and end times:

- The start and end times should represent the actual billable/ face-to-face time with the member. Some providers utilize an Electronic Health Record system in which the times default to the appointment time. This does not account for late arrival or other variables during the session that may affect timing. The rendering clinician must ensure that they update the start and end times to reflect the actual billable time.
- Documentation time (writing a progress note) is not billable time unless a provider is adhering to the *Collaborative Documentation* requirements
- The session time must be represented by the start and end time in actual clock hours. Documenting the duration of the session (i.e. "30 minutes") is not sufficient.
- In transitioning from paper records to an Electronic Health Record (EHR), providers should ensure that their EHR vendor can support all of the PA Medicaid HealthChoices documentation requirements.

While not a comprehensive list, for your reference, here are some additional regulatory citations related to documentation:

- MA Bulletin #28-99-02, 29-99-01  
([http://www.dhs.pa.gov/cs/groups/webcontent/documents/bulletin\\_admin/d\\_004450.pdf](http://www.dhs.pa.gov/cs/groups/webcontent/documents/bulletin_admin/d_004450.pdf))
- MA Bulletin #99-97-06  
([http://www.dhs.pa.gov/cs/groups/webcontent/documents/bulletin\\_admin/d\\_005037.pdf](http://www.dhs.pa.gov/cs/groups/webcontent/documents/bulletin_admin/d_005037.pdf))
- MA Bulletin #29-02-03, 33-02-03, 41-02-02  
([http://www.dhs.pa.gov/cs/groups/webcontent/documents/bulletin\\_admin/d\\_006952.pdf](http://www.dhs.pa.gov/cs/groups/webcontent/documents/bulletin_admin/d_006952.pdf))
- PA Code, Title 55 (<http://www.pacode.com/secure/data/055/055toc.html>)

At Magellan, we will continue to educate our providers with updated MA Bulletins, Regulations and other pertinent information in order to ensure Compliance.

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

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