

# Magellan Compliance Notebook – July, 2015

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 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 we'd like to share information from the recent Office of Mental Health and Substance Abuse Services (OMHSAS) sponsored Certified Peer Support (CPS) training which included an in-depth segment on Collaborative Documentation (CD). Although many Magellan providers were able to attend these beneficial workshops, we wanted to ensure that all Certified Peer Support Supervisors and agency leadership have received and reviewed the materials. The training included pertinent information regarding the need for new policy development and training requirements within your provider agency. **In order to bill for the time spent working collaboratively with a member on documentation specific to Certified Peer Support services (including service plans and progress notes), providers must be compliant with the expectations.**

As you recall, on April 15, 2014, OMHSAS issued Policy Clarification #02-14-01 regarding compensation and progress notes. The Policy Clarification was intended to address whether the time spent working collaboratively with members in the completion of progress notes could be considered part of the Medicaid billable time for Peer Support (and other services). The response from OMHSAS focused on “the rate setting mechanism that builds documentation time into the service rate and the program requirements that preclude billing directly for documentation time.” Thus, it was concluded that concurrent documentation is not a MA-reimbursable time. Due to the overwhelming response from the provider community and other advocacy groups regarding the need to delineate those aspects of collaborative goal setting and progress assessment and those that are associated with the non-billable aspects of documentation, OMHSAS's Policy Bureau convened a workgroup to better define and support the implementation of the growing practice of CD. The workgroup consisted of Peers, Managed Care Organizations, Providers, Provider Organizations, Advocacy Organizations, County Administrators, Trainers, and OMHSAS Policy and Field Office staff.

In December of 2014, OMHSAS finalized guidelines for the Collaborative Documentation process. As part of these efforts, there was a commitment made to coordinate updates to documentation training courses to include information and activities for utilizing CD. As a result, one-day workshops designed to review the essential elements of Medicaid Funded Certified Peer Specialist documentation requirements in Pennsylvania were scheduled. The workshops, which took place in 3 separate PA regions during the month of June, included new information regarding the “Implementation of Collaborative Documentation in the Pennsylvania Behavioral Health System” in relation to Medicaid Funded Certified Peer Support Services.

Attached are the training materials from these workshops including the power point presentation and a progress note sample which includes an indicator to designate whether a session incorporated Collaborative Documentation.

Below are the key points/ takeaways from the portion of the training that focused on Collaborative Documentation. Please note that these elements **must** be present in order to bill for the time spent working collaboratively with a member on documentation (please see the full training for additional information):

1. The session must be face-to-face (telephone sessions cannot include CD).
2. CD is an Interactive Approach. The peer must be engaged in the process by providing input and perspective.
3. CD can be used in the assessment process, service planning and the writing of progress notes.
4. It's an *Intentional Technique*.
5. Providers must define CD to the individual so the peer is FULLY informed of the process and may choose to participate or not. If a peer declines, the CPS may NOT mandate CD.
6. Documentation must clearly indicate that it was written collaboratively with the individual (recommendation to add a check-box to your templates).
7. CD must occur within the scheduled time of the session. For example, if the scheduled session is 3:00-5:00 PM, the CPS can't ask the peer to stay an additional 15 minutes to work on the documentation. It must be completed by 5:00 PM.
- 8. Providers must have specific policy/ procedures in place for using CD which includes training for staff and ongoing supervision focused on CD.**
9. CD may not be used every session even if a member agrees with the process during previous sessions. For example, if a CPS is meeting with a peer in the community, it might not be appropriate to utilize CD due to confidentiality. Or if a peer is agitated or in crisis during a particular session, it may not be appropriate or beneficial at that time. CD should be utilized on a case-by-case and session-by-session basis.

Magellan will continue to audit contracted Peer Support providers based on our routine audit schedule and in response to ad-hoc concerns. Corrective Action and retractions may be applied when the documentation does not meet these expectations.

At this time, the above guidelines apply to Peer Support services only. Additional trainings or communications focused on other programs/ services are currently being considered.

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!

## Magellan of Pennsylvania's Compliance Team

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