

Magellan Compliance Notebook

March, 2014

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 targeted providers on a Compliance related subject. This month, we'd like to share an updated policy clarification regarding group services with all Magellan-contracted Partial Hospital programs.

On February 27, 2014, OMHSAS released Policy Clarification #01-14-01 which addresses the issue of group services provided in Partial Hospital Programs (PHPs). The request for clarification was in follow-up to Policy Clarification #01-13 (also attached), which was distributed in March, 2013. The initial policy clarification confirmed that licensed and enrolled Partial Hospital Programs must comply with 55 PA Code Chapter §1153 regarding the size and duration of all groups. Specifically, Group Psychotherapy is defined as "psychotherapy provided to no less than two and no more than ten persons... for a period of at least 1 hour."

During charts audits following the 2013 Policy Clarification, it was observed that in some cases, group therapy was identified when what was actually provided did not adhere to the definition of group psychotherapy. Furthermore, OMHSAS has received multiple requests from providers for a waiver of the definition of group therapy for their Partial Hospital Program.

In response of these two factors, OMHSAS has clarified the following:

- If the service that is determined to be **medically necessary** and identified in the recipient's individualized treatment plan is **Group Psychotherapy**, then in order to be compensable through MA funding, the group psychotherapy service that is provided must meet all requirements in 55 PA Code Chapter §1153 including the minimum (2) and maximum (10) group size and the duration (at least one hour). Group Psychotherapy sessions must be conducted by a clinical staff person.
- If the service that is determined to be **medically necessary** is a compensable PHP service (compensable PHP services include: individual, group and family psychotherapy; health education; instruction in basic care; instruction in basic personal financial management; medication administration and evaluation; guided social interaction; crisis management; and referral) but is not psychotherapy (for example: health education), any corresponding group does *not* need to meet the requirements in Chapter §1153.
- In the case where a health education group, for example, is medically necessary, the service and group modality must be specifically identified in a client's individualized treatment plan, and the service provided in a group format must be documented as such, and not documented as "Group Psychotherapy".

- As a reminder, PHP services must be provided for a minimum of 3 hours and a maximum of 6 hours in a 24-hour period. Please note that since PHP services are reimbursed per hour of service, the individual must receive one full hour of one or more PHP compensable services before that PHP can bill for that hour.

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

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