

# Magellan Compliance Notebook – March, 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 **Peer Support Services and Targeted Case Management (all models enrolled under Case Management including BCM, ICM, RC, TIP, etc.) providers in order to clarify the regulations concerning time spent in travel or transportation while rendering services to Magellan HealthChoices members.**

As previously communicated by Magellan in February, 2013 and January, 2015 (<http://www.magellanofpa.com/for-providers-pa/provider-communications/monthly-compliance-alerts.aspx>), OMHSAS has issued clear restrictions on the direct reimbursement for time spent in travel (without member present) and transportation (with member present) specific to Certified Peer Support and Targeted Case Management services.

## **Regulatory references:**

### Targeted Case Management Services

- The Federal regulation at 42 CFR §440.169 (relating to case management services) specifies the components of case management services. Section 440.169 does not identify the time a case manager spends Traveling as a component of case management services. Therefore, units of service **cannot be billed** for time spent traveling to a beneficiary to provide a case management service. Likewise, transporting or escorting consumers to appointments or other places is not identified under 42 CFR §440.169 as a component of case management services.
- Based on the Federal regulation, DHS Bulletin OMHSAS-13-01 ([http://www.dhs.pa.gov/cs/groups/webcontent/documents/bulletin\\_admin/p\\_033890.pdf](http://www.dhs.pa.gov/cs/groups/webcontent/documents/bulletin_admin/p_033890.pdf)) was issued in January, 2013 to provide the policy that “case manager travel time and time spent transporting or escorting consumers **should not be billed as a unit of service.**”

### Peer Support Services

- Per the Peer Support Services (PSS) Provider Handbook ([http://www.dhs.pa.gov/cs/groups/webcontent/documents/bulletin\\_admin/c\\_253198.pdf](http://www.dhs.pa.gov/cs/groups/webcontent/documents/bulletin_admin/c_253198.pdf)) , **Non-compensable services** includes “costs related to travel”.
- MA Bulletin 08-07-09, 11-07-03, 21-07-01 ([http://164.156.7.185/parecovery/documents/PSS\\_MA\\_Bulletin\\_052207.pdf](http://164.156.7.185/parecovery/documents/PSS_MA_Bulletin_052207.pdf)) states: Provider staff meetings, record-keeping activities and other non-direct services are not billable as peer support... travel was included developing the MA fee and therefore **is not billable**.
- OMHSAS Q&A:
  - **Question:** Are Certified Peer Specialist (CPS) permitted to bill for transportation? For example: transporting a consumer to a meeting, appointment etc.
  - **Answer:** No, **transportation is not a billable service**. The standards for Peer Support Services state “travel time, staff meetings, record-keeping activities, and other non-direct services are not compensable.” Given that transporting individuals is not a Medicaid billable service, the policies of the PSS agency must also be considered. Agency policies for CPSs may or may not allow for transporting individuals receiving services. A CPS would need to confirm their agency’s PSS policies on this before providing the service. Additional information regarding Federal regulation specific to transporting or escorting consumers to appointments or other places can be found in Bulletin OMHSAS-13-01 Targeted Case Management (TCM) – Travel and transportation guidelines.

### Conclusions:

- Time spent in travel and transportation while rendering Targeted Case Management (TCM) Services and Peer Support Services (PSS) is not directly reimbursable. The costs for these activities is included in the rate.
- Targeted Case Managers (TCM) and Certified Peer Specialists (CPS) should comply with their agency’s internal policy related to transporting members. If a TCM or PSS provider permits their staff to transport members, the time spent transporting the member is not billable time. This provision is regardless if services are being provided in the vehicle (i.e. if a Blended Case Manager or Recovery Coach is transporting a member to an appointment and they are discussing a member’s service plan goal, this is still not billable time).
- Documentation (i.e. progress notes) **should clearly demonstrate** that time spent in travel and transportation is not being included in the billable time.
- Travel Training refers to a TCM or CPS working with an individual who requires development in relation to learning a specific skill such as riding the bus. Travel transportation may be billable time – if, and only if the Treatment Plan/ Recovery Plan/ Individual Service Plan contains a goal related to the consumer needing to gain this skill, and that the progress notes show work related to this goal. The goal must be time-limited.

During audits, Magellan continues to observe a consistent trend of non-adherence which results in retractions for services rendered. We understand that there has been some confusion from providers related to providing services while transporting members and travel training; however this communication should serve to clarify the billable vs. non-billable activities related to TCM and PSS services.

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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