



# Magellan Compliance Notebook

Good morning!

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 month's communication is directed to Mental Health and Substance Abuse Outpatient Clinics and other providers that bill for Group Therapy services including IOP (90853, H0015 and H0004 billing codes).

Recent audits have revealed a trend of outpatient providers billing for time not spent providing direct services. Specifically, providers are conducting group therapy and the curriculum includes one or multiple 10-15-minute breaks during the session; however they are bundling this break time into the total time billed. For example, a provider conducts a scheduled group between 9:00- 11:00 a.m. At 10:00 a.m. the clinician excuses all participants for a 15-minute break. The group reconvenes at 10:15 a.m. and then wraps up at 11:00 a.m. The provider is contracted for group therapy by 15-minute units and bills the continuous time frame between 9:00- 11:00 a.m. or 8 total units. However, only 7 full units of direct service were provided. Thus, the provider billed for services not rendered. In this case, the provider should have billed for 7 units instead of 8.

Similarly, some participants may arrive late to a group session or leave early; however the scheduled group session time is being recorded on the member's progress note instead of the actual face-to-face time. For example, a group session is scheduled from 2:00- 4:00 p.m., however member A arrives at 2:10 p.m. and a member B leaves at 3:50 p.m. In the overpayments that have been identified during audits, a provider will indicate that all group participants attended the group from 2:00- 4:00 p.m. and bill accordingly. However, the documentation for member A should show attendance from 2:10- 4:00 p.m. and 1 less unit

should be billed. Member B's documentation should show attendance from 2:00- 3:50 p.m. and again, 1 less unit should be billed.

**Providers must implement a sound tracking mechanism for group participation including arrival and departure time as well as structured breaks. This is individualized by each participant's actual attendance and must correlate to the billable units. Only face-to-face time is billable for all outpatient services (excluding psychological and neuropsychological testing).**

The trend has been more readily identified with Drug & Alcohol Outpatient Clinic providers especially in IOP groups that tend to span a greater duration.

This trend will continue to be assessed during routine and targeted audits by Magellan's Compliance and SIU Departments. Retractions and/or Corrective Action Plans will be applied as indicated.

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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