



Magellan Compliance Notebook

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 includes important guidelines for Magellan contracted Peer Support Services (PSS) providers. On December 28, 2022, the Pennsylvania Department of Human Services (DHS) Office of Mental Health and Substance Abuse Services (OMHSAS) issued an updated PSS Bulletin titled OMHSAS-22-08 and an updated Provider Handbook, Section VII. For your reference, these documents are included [here](#).

The purpose of OMHSAS-22-08 was to announce that Peer Support Services (PSS), identified in a member's Individual Service Plan (ISP), may be provided during transit. This updated bulletin renders Medical Assistance Bulletin OMHSAS-19-05: Peer Support Services Revised as obsolete.

DHS recognizes that there are times a Certified Peer Specialist (CPS) travels with the individual being served. DHS has determined that it may be clinically appropriate for individuals to receive services identified in their ISP during transit with their CPS. The CPS and individual receiving services can use the time spent traveling together to work on service goals included in the ISP. PSS should only be provided while in transit if the CPS determines that providing PSS while in transit is safe and appropriate. The Department has revised the provider handbook to allow for services that are identified in the ISP and are provided while in transit to be compensable.

Magellan's expectations for PSS providers aligns with OMHSAS-22-08 and the updated Provider Handbook. Additionally, clear documentation and rationale of services provided during transit with an individual should include:

- Services provided in transit must include the specific interventions that relate back to the specific goal in the member's ISP.
- The CPS should only transport a member when it is necessary and appropriate. The CPS should be mindful not to create dependence. Other methods of transportation should be explored and utilized whenever possible. If

an individual needs assistance with acquiring a specific skill such as riding the bus to roster independence, it would be appropriate to include this as a time-limited goal on the ISP.

- Providers must document how much time is spent in transit with a member while providing an intervention from the ISP, in addition to other non-billable time in transit. If services provided during transit are not billable, the time spent in transit should be clearly deducted from the overall time billed and this distinction should be clearly documented.
- Providers should have policies and procedures in place that clearly outline their expectations and guidelines for staff around the general transportation of individuals as well as rendering services while in transit.
- Finally, as indicated in OMHSAS-22-08, PSS should only be provided during transit if it is safe and appropriate.

Magellan has updated its Peer Support Provider Performance Standards to align with these changes [here](#).

For providers of Recovery Support Services (RSS/ Certified Recovery Specialists (CRS), please be advised that Magellan is in the process of aligning these changes to the RSS Provider Performance Standards and Magellan's Minimum CRS Program Requirements.

Please also be advised that **this change applies to Peer Services ONLY**. It does not apply to Targeted Case Management Services (including all models enrolled under case management including BCM, ICM, RC, TIP, etc.). 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 was issued in January 2013 to clarify that "case manager travel time and time spent transporting or escorting consumers should not be billed as a unit of service."

At Magellan, we will continue to educate our providers with updated MA Bulletins, regulations, and other pertinent information to ensure Compliance. Although providers are ultimately responsible for knowing and complying with all applicable regulations, we proactively engage providers on an ongoing basis to make sure they are aware of compliance related requirements and expectations. Medicaid Program Integrity is truly a collaborative effort between our providers, county customers, Magellan, Bureau of Program Integrity (BPI) and other oversight agencies. The monthly e-mail blast topics are generated from audit results and trends; however, are also sent in response to recent Magellan policy updates; newly released or relevant MA Bulletins and Policy Clarifications; or Regulation changes. The intention is to afford our providers with as many resources as possible to combat FWA and reduce overpayments.

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

Magellan of Pennsylvania's Compliance Team

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