

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 Recovery Support Services (RSS) providers.

RSS provides opportunities for individuals living with a substance use disorder diagnosis or cooccurring disorder to partner with a Certified Recovery Specialist (CRS) and receive support in the process of achieving their wellness and recovery goals. RSS closely aligns with Peer Support Services (PSS), although RSS is considered an in-lieu-of service in the HealthChoices continuum which means that there are no accompanying state regulations.

On December 28, 2022, OMHSAS issued an updated PSS Bulletin titled OMHSAS-22-08 and an updated Provider Handbook, Section VII. The purpose of OMHSAS-22-08 was to announce that PSS, identified in a member's Individual Service Plan (ISP), may be provided during transit. Magellan is extending this allowance to RSS services as well. As a result, Magellan has updated its RSS Minimum Program Requirements. The full updated requirements can be found <u>here</u>.

Please note that clear documentation and rationale of RSS provided during transit with an individual must include:

- Services provided in transit must include the specific interventions that relate back to the specific goal in the member's ISP.
- The CRS should only transport a member when it is necessary and appropriate. The CRS 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.
- RSS should only be provided during transit if it is safe and appropriate.

Magellan has also updated its RSS Provider Performance Standards to align with these changes here. Please note that Magellan made additional substantive changes to the RSS Performance Standards which includes updates to the educational requirements for CRS staff; service exclusions now include Certified Family Recovery Services (CRFS); updated referral process to include time limit for use of engagement units; and expanded information related to encounter verification.

Please also note that all recovery support programs must also be administered according to their state and Magellan-approved Service Descriptions.

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!

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