



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.

Magellan has previously issued compliance e-mail blasts to ensure contracted substance use disorder (SUD) providers are aware of the American Society of Addiction Medicine (ASAM) Compliance Alignment Requirements and Deadlines. This month, we are re-sharing some guidance that was provided in 2021 as the ASAM alignment exercises expand to ambulatory levels of care.

On April 28, 2021, The Pennsylvania Department of Drug and Alcohol Programs (DDAP) issued a communication titled [ASAM Clarification and Flexibility](#). Effective July 1, 2021, contracted providers were expected to be compliant with specific provisions within The ASAM Criteria, 2013, related to Setting, Support Systems, Staffing, Therapies, Assessment/ Treatment Plan Review and Documentation. Magellan has continued to support providers throughout this Compliance Alignment.

Below is a high-level summary of the existing DDAP Regulations compared to the ASAM expectations. Please refer to the Department of Drug and Alcohol Programs (DDAP) [ASAM Resources page](#) for additional information including the DDAP FAQs. As a reminder, ASAM implementation is not just criteria for Medical Necessity or Level of Care assessments but also using the criteria for the provision of services.

Category of Regulation	Existing Regulations	ASAM Criteria enforced effective July 1, 2021
Staffing Requirements: <i>Supervisor*</i>	DDAP Regulation 704.6	Supervisors must be Licensed or certified by the Pennsylvania Certification Board (PCB) as a Certified Clinical Supervisor (CCS). ➤ “working toward” must be evidenced by a log indicating hours worked, hours supervised and hours needed
Staffing Requirements: <i>Counselor*</i>	DDAP Regulation 704.7	Counselors must be Licensed or PCB Certified ➤ “working toward” must be evidenced by a log indicating hours worked, hours supervised and hours needed
Staffing Requirements: <i>Counselor Assistant*</i>	DDAP Regulation 704.8	Counselor Assistants must be Licensed or PCB Certified ➤ “working toward” must be evidenced by a log indicating hours worked, hours supervised and hours needed

<p>Staffing Requirements: Case Managers*</p>	<p><u>Case Management and Clinical Services Manual</u></p>	<p>Case Managers must be Licensed or PCB Certified; and meet the Minimum Education Training (METs) by the State Civil Service Commission.</p> <p>➤ “working toward” must be evidenced by a log indicating hours worked, hours supervised and hours needed</p>
<p>Therapies: 2.5</p>	<p>Minimum of 10 hours per week</p>	<p>Minimum of 20+ hours per week of individual or group therapy.</p>
<p>Therapies: 2.1</p>	<p>Minimum of 5 hours but less than 10 per week</p>	<p>Between 9-19 hours per week of individual or group therapy.</p>
<p>Therapies: 1.0</p>	<p>Up to 9 hours per week</p>	<p>Up to 9 hours per week with maximum group size of 10 (per PA Code 55 §1223.2). Outpatient SUD Clinics may submit a waiver to OMHSAS for consideration to expand the maximum group size to 12 individuals.</p>
<p>Medication Assisted Treatment (MAT)</p>	<p>Effective July 1, 2020, all programs receiving state and federal funding must arrange for clients to have access to any form of MAT of client’s choosing.</p>	<p>All Programs receiving state and federal funding must arrange for clients to have access to any form of MAT of member’s choosing. Clients are not required to engage in therapy in order to receive medication for substance use disorders.</p>

Training	DDAP Regulation 704.11	In addition to existing training requirements, the following topics must be addressed: - Ongoing training appropriate to population served - Stages of Change & Motivational Interviewing (MI) - Co-occurring Conditions
Therapeutic Milieu: all levels	No current requirement	- Evidenced-Based practices must include MI and an array of other practices (must be documented) - Family sessions must be offered or may include referral to another provider for these services
Therapeutic Milieu: 2.5	Counselor/client ratio 1:10	- Counselor/client ratio 1:10 - Partial Hospital Program must be co-occurring capable.
Therapeutic Milieu: 2.1	Counselor/client ratio 1:15	Counselor/client ratio 1:15
Therapeutic Milieu: 1.0	Counselor/client ratio 1:35	Applies to FTE. Must make adjustments for PTEs

** Staffing Requirements: Current staff are grandfathered if they remain with current employer. If staff move on to another employer after July 1, 2021, they must have updated credentials.*

Magellan will be offering a series of technical assistance sessions for ambulatory level of care substance use providers to gather and discuss difficulties and barriers to achieving ASAM alignment within their organization. Magellan will offer assistance in addressing these barriers to become fully aligned with the ASAM criteria. See below for the detailed information regarding upcoming technical assistance webinars. Any providers of substance use and co-occurring disorder services at all ambulatory levels of care should plan to attend. This includes clinicians, case managers, support staff, peers, supervisors, and program directors.

ASAM Alignment Orientation

April 22, 2026

Location: Zoom

Registration is required:

<https://magellanhealth.zoom.us/meeting/register/IhCP2EwnQGeeQ7Tjek6Ayg>

3:00 pm - 4:15 pm (Please login by 2:45 pm)

ASAM Ambulatory Levels of care

Date: June 17, 2026

Location: Zoom

3:00 pm - 4:00 pm (Please login by 2:45 pm)

Registration information will be sent closer to the date.

ASAM

Date: August 19, 2026

Location: Zoom

3:00 pm - 4:00 pm (Please login by 2:45 pm)

Registration information will be sent closer to the date.

ASAM Wrap-up

Date: October 28, 2026

Location: Zoom

3:00 pm - 4:00 pm (Please login by 2:45 pm)

Registration information will be sent closer to the date.

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, they 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

📞 215-504-3967 | 📠 866-667-7744