



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 communication is directed to Peer Support Services (including Recovery Support Services) and Case Management Services (all models including BCM, ICM, RC, TIP, SUD CM, etc.) providers in order to clarify the regulations concerning time spent in travel or transportation while rendering services to Magellan HealthChoices members.

The Department of Human Services (DHS) Office of Mental Health and Substance Abuse Services (OMHSAS) has issued clear guidelines on the direct reimbursement for time spent in travel (without member present) and transportation (with member present) specific to Peer Support and Case Management programs. While billing for Travel/ Transportation has been restricted in Case Management services since 2013, there were changes to the Peer Support Services Bulletin in December 2022.

The below reminders are a summary of the guidelines that are in place for all services.

Targeted Case Management Services (all models enrolled under Mental Health Case Management including BCM, ICM, RC, TIP, etc.)

- 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](#) 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.” The costs for these activities are included in the rate.

- Magellan’s expectations for TCM providers aligns with OMHSAS-13-01 in that **time spent in travel or transportation is not directly reimbursable**.
- Targeted Case Managers should comply with their agency’s internal policy related to transporting members. If a TCM provider permits their staff to transport members, the time spent transporting the member is not billable time. This provision is regardless of 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 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.

Substance Use Disorder Case Management Services

- Substance Use Disorder (SUD) Case Management Services are considered an in-lieu-of service in the HealthChoices continuum which means that there are no accompanying state regulations.
- As SUD CM services closely align with Targeted Case Management services, Magellan does not allow the direct reimbursement of time spent in travel or transportation.
- Documentation (i.e. progress notes) *should clearly demonstrate* that time spent in travel and transportation is not being included in the billable time.
- Please refer to Magellan’s [February 2022 Compliance E-mail Blast](#) for additional details.

Peer Support Services

- On December 28, 2022, DHS OMHSAS issued an updated Peer Support Services Bulletin titled [OMHSAS-22-08 and an updated Provider Handbook, Section VII](#). 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.
- DHS determined that it may be clinically appropriate for individuals to receive services identified in their ISP during transit with their Certified Peer Specialist (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.
- Magellan’s expectations for PSS providers aligns with OMHSAS-22-08 and the updated Provider Handbook in that PSS identified in a member’s ISP **may be billable time, even during transit**.
- Clear documentation and rationale of PSS 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.

Recovery Support Services

- Recovery Support Services (RSS) are considered an in-lieu-of service in the HealthChoices continuum which means that there are no accompanying state regulations.
- As RSS closely aligns with Peer Support Services, Magellan allows the direct reimbursement of RSS provided during transit if identified in a member's ISP.
- Please refer to Magellan's [May 2023 Compliance E-mail Blast](#) for additional details and guidelines.

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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