

## **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 Psychiatric Rehabilitation Services (PRS) Providers. It focuses on the updated PRS regulations, accompanying FAQ published by The Office of Mental Health and Substance Abuse Services (OMHSAS) and some important guidelines for providers related to the documentation of PRS services.

The Office of Mental Health and Substance Abuse Services (OMHSAS) recently promulgated updates to 55 PA Code § 5230 Psychiatric Rehabilitation Services (PRS) which were effective on January 18, 2025, upon publication in the Pennsylvania Bulletin. The updated regulations have now been posted in the Pennsylvania Code. On March 12, 2025, OMHSAS also issued a Frequently Asked Questions (FAQ) document.

The key changes to the regulations include:

- Allow individuals who are 14 years of age or older but under 18 years of age who meet the admission requirements to access Psychiatric Rehabilitation Services (PRS), broadening access to younger populations.
- The inclusion of individuals with posttraumatic stress disorder, bipolar disorder, major depressive disorder, and anxiety disorders without requiring an exception process.
- Implementation of a weekly file note requirement to ensure comprehensive documentation of participant progress and engagement in PRS while reducing administrative burden.

Magellan wants to ensure that our contracted PRS providers have reviewed the updated regulations and accompanying FAQ which have been provided as links above.

Additionally, Magellan has important guidelines to communicate to providers regarding our **documentation expectations** to support paid claims:

- Magellan **strongly** recommends and encourages providers to continue documenting daily notes which include specific times of attendance for each member. Daily progress notes help providers ensure accurate claims submission practices.
- If providers elect to complete weekly notes in accordance with the updated regulations, Magellan is requiring PRS providers to include on the weekly note, the member's daily attendance times including any breaks (this allows you, and us, to reconcile the daily units billed for each member). As a reminder, the OMHSAS FAQ clarified that a PRS agency must maintain daily attendance records which include attendance start and end times and activities/ sessions attended. Magellan is further requiring that this information be included in the weekly progress note.
- As outlined in the FAQ, whether using daily or weekly notes, the documentation must clearly identify the group sessions, individual sessions, and/or activities the individual participated in during each date of attendance.
- If using weekly notes, each PRS staff person who worked with an individual on any activity during the week must sign and date the weekly progress note.
- As a reminder and in accordance with MA Bulletin 99-89-05, signed encounter forms from the member are also required (this can be a daily/ weekly/ monthly encounter form in accordance with Magellan's prior guidance, but all unique dates of service must be included if using a weekly or monthly form). Additionally, start and end times are also required on encounter forms for all community-based services (mobile PRS) and their inclusion is a best practice for all other services.

Please also be advised that if providers are planning to expand their target population to serve adolescents under 18, they are required to submit an updated Service Description to Magellan and OMHSAS. PRS remains an in-lieu of service under the HealthChoices program and therefore, providers must work with the Behavioral Health Managed Care Organization to expand their PRS programs. This will also require a contract amendment with Magellan if the expansion is approved.

Magellan will be auditing PRS providers against the new regulations later this year. Please reach out to our Compliance Team (<u>pahccompliance@magellanhealth.com</u>) if you have any questions related to the expectations.

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 o 215-504-3967 | F 866-667-7744