



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.

For this month's communication, we would like to ensure that all providers are aware of the latest activity regarding the Telehealth "Four Walls Rule."

Previously, under 42 CFR § 440.90, the "Four Walls Rule," it was required that during Medicaid outpatient behavioral health clinic telehealth services, either the patient or the clinician had to be physically onsite at the licensed clinic location. As Telehealth emerged as the core modality for service delivery during the Public Health Emergency (PHE), The US Centers for Medicare and Medicaid Services (CMS) waived the "Four Walls Rule" requirement.

Earlier this year on March 18, Magellan sent a [communication](#) to providers recognizing the uncertainty and challenges this regulation presented to our system of care. Advocacy continued throughout the year, and we are pleased to report that on Friday, November 1, the US Centers for Medicare and Medicaid Services (CMS) released a final rule for calendar year 2025 that will give states the option to cover *Medicaid telehealth behavioral health clinic services delivered outside the "four walls."*

Based on prior discussions, it's our understanding that Pennsylvania is fully supportive of covering Medicaid telehealth behavioral health clinic services delivered outside the "four walls" and will align with the CMS final rule. The final rule should take effect on January 1, 2025. In the meantime, it is the expectation that telehealth services will continue to be delivered as per current operating standards to ensure service access to individuals.

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

☎ 215-504-3967 | **F** 866-667-7744