



State of New Jersey
Department of Human Services
Division of Medical Assistance & Health Services

NEWSLETTER

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TO: Independent Clinics – Providers of Partial Care Mental Health Programs - **For Action**
Outpatient Hospital Clinics - Providers of Partial Hospitalization Mental Health Programs - **For Action**
Health Maintenance Organizations - **For Information Only**

SUBJECT: **Off-Site Partial Care/Partial Hospitalization Services**

EFFECTIVE: **Immediately**

PURPOSE: To notify providers of Partial Care/Partial Hospitalization (PC/PH) mental health services of guidelines for off-site clinic services as components of PC/PH mental health programs.

BACKGROUND: In January 1998, PC/PH providers were reminded by the Division of Mental Health Services (DMHS) of certain requirements that had to be met in order for PC/PH services to be reimbursable under the Medicaid program. Among those was the federal requirement that clinic services must be provided **on-site** unless they are rendered to an “eligible individual who does not reside in a permanent dwelling or does not have a fixed home or mailing address.”

There have been questions concerning whether off-site clinic services provided to individuals **as part of their treatment plan** during active programming were eligible for reimbursement under the Medicaid program. This Newsletter is intended to provide guidelines for Medicaid and NJ KidCare fee-for-service coverage of off-site clinic services as components of PC/PH programs.

ACTION: Effective immediately, the following guidelines will apply to **off-site clinic services** when and if provided as components of PC/PH mental health programs:

Individual off-site PC/PH clinic activities are permitted and will be reimbursed by the Division only if the conditions described below are met.

Small group activities are permitted and will be reimbursed by the Division only if the conditions described below for each individual client that is participating in the group are met.

1. On an individual basis, off-site interventions are allowed provided that the clients are accompanied/supervised by staff and those interventions are:
 - a) Prescribed by a physician;
 - b) Individualized for each client;
 - c) Integrated into the plan of care;
 - d) Properly documented in the client's treatment plan;
 - e) Limited to a defined and measurable period of time.
2. All PC/PH activities must be therapeutic in nature. The specific activities must be aimed at reducing the beneficiary's mental disability and restoring or maintaining functionality.
3. Individual, specific interventions must directly assist in teaching, practicing or applying critical competencies or experiences. These activities shall be prescribed by a physician, must include active counselor instruction, be integrated into the client's individual treatment plan, and must be able to be clearly timed and measurable so that the client's progress and/or participation can be clearly documented.
4. Services, which are solely recreational in nature, are not reimbursable by the Division.
5. The **individualized treatment plan** must clearly state each specific off-site intervention and how it relates to the overall achievement of the client's specific goals and objectives in the treatment plan.

An example of an appropriate off-site PC/PH clinic service would be the following: A client enters a Partial Care program after extended inpatient treatment in a State hospital. The client's course of illness has caused him/her to lose critical living skills that are essential to live in the community and to avoid further hospitalization.

One of the client's *goals* is to live in an apartment with a roommate by July 1, 2000. One *skill deficit* requiring remediation that is directly related to the goal of successfully cohabitating in an apartment is shopping for food. The client's treatment plan contains an *objective* of learning to effectively purchase food at the local grocery store one day a week for ten weeks. After learning key steps to effectively purchasing groceries in a shopping group at the PC program, a counselor and client apply what the client has learned by the *intervention* of practicing

purchasing groceries at the local food store once a week, for two hours, over the course of ten weeks.

An example of how to document this type of off-site activity in the client's treatment plan is outlined below:

Goal: Cohabitate in an apartment by July 1, 2000;

Objective: Learn how to effectively shop for food;

Skill Deficit: Capacity to shop for food; and

Intervention: The counselor (identify) will accompany the client to store (identify) on Wednesday afternoons, for two hours, for the next ten weeks so the client can practice skills learned in the shopping group on Tuesday.

6. All off-site activities must be a *subordinate component* of an individual client's overall treatment plan. This subordinate component shall constitute less than ten percent (10%) of an individual client's active programming time during a twelve (12) month period. If off-site activities are greater than 10% of an individual client's program and deemed medically necessary, such requests must be prior authorized by the Division. Specific procedures for requesting prior authorization for mental health services are outlined at N.J.A.C. 10:66-1.4(c).
7. Clients must be accompanied by a counselor to procure necessary services as outlined in N.J.A.C 10:66-6.3.

Exception: Those instances where clients have achieved sufficient independence to be accompanied by only a driver to procure a necessary service. This must be reflected in the client's plan of care.

The procurement of necessary services is considered a component of the PC/PH program and is covered by the Division when it is an integral component of the individualized plan of care. This time is not considered an off-site activity for the purposes of the 10 percent described above.

8. Documentation must be maintained regarding when the off-site activity commenced and terminated and when the on-site activity commenced and terminated.
9. Prior to participating in any off-site activity the client must sign in at the clinic site of the PC/PH program. In addition, after completion of the off-site activity, the client must return to the PC/PH clinic site to sign out of the program for the session.
10. Prior authorization (PA) is not required for off-site services for clients receiving less than ninety (90) days of PH or less than \$6,000.00 of PC services during a service year. However, PA requests for continued PH or PC services beyond these limitations must include, as part of the client's *individualized* care plan, a description

of the goal(s), objective(s), skill deficit(s), and intervention(s) directly related to the off-site service to be provided to a client.

11. Transportation to and from the off-site activity shall not be counted as part of the minimum time requirement when billing for PC/PH services, unless

- The provider has one or more counselors in the vehicle functioning as counselors, not as a driver; and
- The counselor conducts activities during the transportation that meet all the requirements for allowable activities of a PC/PH program.

For example, a small group of clients leaves the clinic to participate in an off-site activity, and a counselor accompanies the clients in the vehicle, performing services that are allowable PC/PH services, and not functioning as the driver. The time spent in the vehicle is countable towards the PC/PH billing unit. If the counselor meets the group at the off-site location, the transportation time is not countable. If the counselor is the driver, the time is not countable regardless of whether the counselor is performing otherwise allowable PC/PH activities. If the counselor does not perform otherwise allowable PC/PH activities, the time is not countable.

If you have any questions concerning this Newsletter, please do not hesitate to contact Rosaline T. Fleming, R.N., MS, CS, APN, at (609) 588-2749.

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