



Community Behavioral Health: Provider Notification Group Therapy Size Limitations November 18, 2016

Community Behavioral Health (CBH) is issuing this Provider Notice as a reminder regarding the limitations on the number of participants in Group Therapy in Outpatient Mental Health and Addictions Services. Medicaid restricts the number of participants, as noted below. Billing for services provided in excess of these parameters is subject to repayment for all CBH participants, not just those exceeding the limits. CBH will be adding this element to Compliance Department reviews in future audits. It is important that documentation allows for group size to be ascertained. Progress notes should clearly indicate the number of participants in the group, without listing names or identifiers of other group members.

Please review the relevant regulations as well as your program policies and procedures to ensure that you are not in violation of this standard; policies and procedures should be revised accordingly to ensure alignment with these regulations. CBH will be holding providers for which Group Therapy is a Supplemental Service to these same standards. Other programs such as Community Integrated Recovery Centers (CIRCs) utilizing group therapy services should follow the relevant Commonwealth regulations.

Group Therapy

Medical Assistance regulations for both Mental Health and Addictions Services limit Group Therapy size to 10. This is the maximum number of TOTAL participants, not just CBH members. This number also excludes any treatment staff and may not be increased by using co-facilitators.

Mental Health, MA Regulations Title 55, CHAPTER 1153. OUTPATIENT PSYCHIATRIC SERVICES; GENERAL PROVISIONS:

- 1153.2. Definitions

Group psychotherapy—Psychotherapy provided to no less than two and no more than ten persons with diagnosed mental disorders for a period of at least one hour. These sessions shall be conducted by a clinical staff person.

Drug and Alcohol, MA Regulations Title 55, CHAPTER 1223. OUTPATIENT DRUG AND ALCOHOL CLINIC SERVICES, GENERAL PROVISIONS:

- 1223.2. Definitions

Group psychotherapy—Psychotherapy provided to no less than two and no more than ten persons with diagnosed drug/alcohol abuse or dependence problems for a minimum of one hour. These sessions shall be conducted by drug/alcohol clinic psychotherapy personnel under the supervision of a physician.

Psychoeducational Groups

Often, valuable and medically necessary group treatment occurs outside of the traditional group psychotherapy models. Typically these groups are labeled as “psychoeducational.” Psychoeducational groups are permissible as a limited adjunct to more traditional therapy modalities (Individual, Group, and Family). Psychoeducational groups are permitted as part of a treatment course in programs such as Partial Hospital Programs, Intensive Outpatient Programs (IOP), Residential Treatment Facilities, Inpatient and Non-Hospital Detoxification and Rehabilitation Units, and Halfway Houses. Psychoeducational groups are not billable as stand-alone services.

Examples of Psychoeducational Group topics include, but are not limited to:

- Vocational and Occupational training
- Life skills
- Parenting/Family Reunification
- Structured Social Activities
- Dynamics and Medical Aspects of Addiction
- Abstinence and Its Role in Recovery
- Use of Self Help and Support Group
- Nutrition
- Sex and Sexuality
- Family Dynamics of Addiction
- Confrontation Skills
- Refusal Skills
- Avoiding and Defusing Triggers for Relapse
- HIV and STDs

The maximum group size for psychoeducational groups in order to be reimbursed by CBH is 15 participants. This number excludes any treatment staff and may not be increased by using co-facilitators. In order to be eligible for CBH reimbursement, psychoeducational groups must be conducted by staff appropriately credentialed to provide this service in the relevant level of care. Appropriately credentialed interns may conduct psychoeducational groups as long as the fully credentialed supervisor co-signs all notes by the intern. Certified Peer Specialists may also lead psychoeducational groups so long as the provisions set forth in the Medical Assistance Handbook are as follows:

Provider agrees that it will typically provide peer support services on an individual (1:1) basis but may offer group services for several individuals together when such services are beneficial, provided that group services may not include social, recreational or leisure activities. To receive peer support services in a group, individuals must share a common goal, and each individual must agree to participate in the group. Services such as psychoeducation or WRAP (Wellness Recovery Action Planning) are the types of services that may be provided in groups.

http://www.dhs.pa.gov/cs/groups/webcontent/documents/bulletin_admin/d_004594.pdf

Questions regarding this Notification can be directed to CBH.ComplianceContact@phila.gov.