



**Community Behavioral Health: Provider Notification  
Provider Notice Regarding Supervision of Therapeutic Staff Support  
(TSS) in Behavioral Health Rehabilitative Services (BHRS)  
April 13, 2017**

CBH has observed that many BHRS providers utilize their Behavior Specialist Consultants (BSC) and Mobile Therapists (MT) for the onsite component of supervision for (TSS) workers. Providers are reminded that Medical Assistance (MA) regulations indicate the following:

1. Provider billing for TSS supervision is prohibited. Therefore, CBH Compliance Department considers billing for supervision of TSS workers a Non-Billable Activity (*Audit Variance Code N*) and will recoup payments during audits made for BSC and MT claims in which the documentation indicates the provision of supervision of a TSS by a BSC or MT.
2. BSC and MT case consultation, a billable activity, cannot be counted as TSS supervision. BSC and MT case consultation activities should be clearly documented as such in the member's chart.
3. TSS workers should be supervised by one supervisor who:
  - Is a licensed mental health professional
  - Holds a graduate degree and at least one year of experience either
    - In a Child and Adolescent Service System Program (CASSP) as defined by MA<sup>1</sup> or
    - Employed by a licensed mental health agency or subcontracted agency
4. The BSC or MT for a particular child is not the supervisor for the TSS assigned to the case.
5. Periodic on-site supervision must be part of TSS supervision, and providers may bill for TSS services delivered during on-site supervision. (Some providers have misinterpreted this stipulation to mean the BSC and MT assigned to the child can provide the supervision. This is an incorrect reading of the MA requirement).
6. Documentation of TSS supervision must be kept in the employee file, not in a member's chart.

Details regarding MA regulations of TSS supervision can be found in MA Bulletin 01-01-05 *Revisions of Policy and Procedures Relating to Mobile Therapy, Behavioral Specialist Consultant and Therapeutic Staff Support*<sup>1</sup> and in the *Frequently Asked Questions* addendum to the MA Bulletin.<sup>2</sup>

<sup>1</sup> Commonwealth of PA, Department of Public Welfare. (2001). *Revisions of Policy and Procedures Relating to Mobile Therapy, Behavioral Specialist Consultant and Therapeutic Staff Support*. PA Department of Public Welfare. Retrieved 4/11/17 from [http://www.dhs.pa.gov/cs/groups/webcontent/documents/bulletin\\_admin/d\\_004396.pdf](http://www.dhs.pa.gov/cs/groups/webcontent/documents/bulletin_admin/d_004396.pdf)

<sup>2</sup> Commonwealth of PA, Department of Public Welfare. *Behavioral Health Rehabilitative Services (BHRS) Frequently Asked Questions*. Retrieved 4/11/17 from <http://www.dhs.pa.gov/provider/frequentlyaskedquestions/behavioralhealthrehabilitationservicesbhर्सfrequentlyaskedquestions/>

Please note that TSS supervision documentation may be requested as part of Network Improvement and Accountability Collaborative (NIAC) and/or Compliance Department site visits. Questions regarding this Notification can be directed to [CBH.Compliancecontact@phila.gov](mailto:CBH.Compliancecontact@phila.gov).