



Community Behavioral Health: Provider Notice Group Size Reminder July 23, 2019

In November 2016, Community Behavioral Health (CBH) issued a Provider Notice reminding network partners about limitations on the number of participants in group sessions, both therapeutic and psychoeducational. The original notice is available online ([view here](#)).

CBH Compliance recently completed a review of all in-network Intensive Outpatient (IOP) providers. The visits and associated chart reviews revealed that many providers are regularly exceeding the maximum allowable number of participants in group sessions.

Providers are reminded that the **maximum allowable number of participants for a valid group session is 10 for therapy groups and 15 for psychoeducation groups**. This number cannot be expanded by using co-facilitators.

Providers must ensure that group sessions do not exceed the maximum allowable number of participants. Further, providers must ensure that auditors can easily determine the number of participants in the group sessions through chart documentation. Group sizes should be documented in the chart and sign-in sheets and/or encounter forms should be available for review to confirm the group size reported.

CBH Compliance will conduct follow-up reviews of programs where group sizes were documented beyond the maximum allowable number of participants. Please note that, in cases where groups exceed the maximum allowable number of participants, a valid, reimbursable service has not been provided to any participant present. Consequently, CBH Compliance will initiate recoupment of payments made for all CBH members in the identified session(s). Additionally, CBH reserves the right to utilize extrapolation to determine the scope of overpayments made for invalid groups.

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