Welcome to both our providers and to our new CBH CEO – Dr. Faith Dyson-Washington!
2020
What a Year It’s Been!
Thank you to our providers for displaying remarkable flexibility and adaptability to ensure that CBH members received needed services in 2020!!
The COVID Response – CBH Compliance

CBH Compliance shifted priorities in early 2020 in response to the COVID-19 related emergency declaration. Some key changes or actions included:

- Suspension of most typical auditing activity
- Suspension of overpayment recoveries while Alternative Payment Arrangements (APA) were in place
- Providing guidance to CBH staff, members and providers on changing rules, regulations, and emerging fraud schemes
- Assisting in APA implementation and monitoring
- Completion of work already in-house
- Re-tooling of policies and procedures
- Investigation and implementation of changes to streamline compliance functions
The COVID response – Commonwealth and Federal response

- Extension of many deadlines (staff credentialing requirements, treatment planning, etc)
- Easing at Federal and Commonwealth levels of restrictions and limitations on use of telehealth
- Related to telehealth, suspension of most HIPAA related enforcements by OCR
- CMS extensions on some reporting requirements
- CMS policy waivers for many healthcare settings
- EUAs widened (and then rolled back in some cases) for lab testing
- Easing of limitations, at Federal level, of some place of service restrictions
OMHSAS – COVID-19 Public Health Emergency Suspended Regulations List
Published: 10/22/2020

*The regulatory suspensions included in this chart are valid from March 6, 2020, and will remain in place while the Disaster Proclamation related to COVID-19 remains in effect or such other time as DHS/OMHSAS directs.

<table>
<thead>
<tr>
<th>Regulation Suspended</th>
<th>Regulation’s Purpose</th>
<th>Scope of Suspension</th>
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</thead>
<tbody>
<tr>
<td>Inpatient Psychiatric Services</td>
<td>(a) Before authorization for payment for care provided to a recipient 21 years of age or older, the attending or staff physician shall establish, and include in the recipient’s medical record, an individual written plan of care.</td>
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<tr>
<td>55 Pa. Code 1131.6.5 Plan of Care</td>
<td>Limited Suspension: A certified registered nurse practitioner or a physician assistant may substitute for the physician to perform this function, provided it is within their scope of practice.</td>
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<tr>
<td>Outpatient Psychiatric Services</td>
<td>Payment will not be made for the following types of services regardless of where or to whom they are provided: [1] A covered psychiatric outpatient clinic, MHNH or partial hospitalization outpatient service conducted over the telephone.</td>
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<tr>
<td>55 Pa. Code 1153.14 Non-covered Services</td>
<td>Limited Suspension: Services may be delivered via telehealth if clinically appropriate to do so. Telephone may be used if video technology is not available.</td>
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</tr>
</tbody>
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What has not changed?

- Fraudsters are still out there
- Accurate claims must still be submitted
- Staff Credentialing continues
- Hotlines and reporting requirements continue
- Exclusion list checks must be completed
- Compliance programs are more important than ever!
Common COVID related schemes

• Variations on old themes are being seen
• The current level of anxiety and changes to normal working processes present an opportunity for fraudsters
• Some common schemes that are being reported include:
  • "Snake Oil" Sales
  • Fake or unproven/unlicensed lab schemes
  • Phishing using spoofed government contacts
  • Fake/expired DME/supplies/medications
  • Corporate fraud (ghost employees/vendors, etc)
What's in store for 2021?

- Our 2021 Workplan
- CBH Compliance Workplan typically uses HHS OIG Workplan for base
- Some areas that are anticipated to be on the workplan:
  - COVID/APA Monitoring
  - Review of telehealth usage/efficacy
  - Effective use of funding for substance use treatment
  - Continue work on transition from FFS to VBP
  - Increase effectiveness - data mining and business rules
How Can Providers Prepare or Assist?

✓ Look out for & respond to communications from Compliance
✓ Review Compliance Plans for new or expanded areas of vulnerability
✓ Plan for response to audit/information requests while adhering to CDC guidance
✓ Review and plan for self-auditing in 2021
✓ Prepare and validate data on outcomes particularly related to telehealth and VBP
✓ Consider FWA related training needs
✓ Review staff credentialing requirements and plan for meeting necessary steps
What's Happening Today!

Three sessions today:

Independent Practitioner Guidelines with Alva & Emily
Compliance 102 with Lauren & Leann
Rat-Stats & Sampling – The Teen Years with Matt & Ken

Our 2020 Quotes of the Year:
- "Make sure you are muted" & "Ask questions in the chat"
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