



Community Behavioral Health: Provider Notice Continuity of Operations and Access for All Network Providers December 3, 2020

The Coronavirus Disease 2019 (COVID-19) pandemic continues to impact the Philadelphia community. The CBH Provider Agreement requires that “in the event of a major disaster or epidemic as declared by the Governor of the Commonwealth, providers render all services provided for in this Agreement to the extent practical within the limits of a Provider’s facilities and staff which are then available.”

CBH, the Office of Mental Health Substance Abuse Services (OMHSAS), and other regulatory agencies have waived several requirements to support provider ability to deliver services seamlessly through the pandemic. Additionally, CBH implemented, and has extended, an Alternative Payment Arrangement (APA) for those providers who opt for this payment methodology to assist in sustaining agency operations. As a reminder maintenance of access is a requirement of the APA.

Providers are expected to incorporate both a clinical and public health approach to ensure individuals in need of services are able to access appropriate behavioral health treatment during the COVID-19 pandemic while focusing on member and staff safety and minimizing transmission of the virus.

Given the evolving nature of COVID-19 and to mitigate against the spread of the virus, provider closures to admissions and/or new intakes may be warranted; however, provider agencies must consider the impact on access to services for new and existing members when determining to close units, take beds offline, or close to new intakes. Failure to notify CBH of any change to operations impacting access will be considered an event of default of the Provider Agreement and may result in any, or all, sanctions available under the Agreement. Additionally, CBH retains the right to recoup some, or all, of a provider’s APA as a consequence of a closure resulting in limited, or no, access to services through the provider agency.

CBH acknowledges the myriad of challenges affecting provider operations during the pandemic and appreciates your continued partnership. We invite you to discuss any challenges that your agency is experiencing, or anticipating, that might impact on access to services.

Please direct any questions to your Provider Representative.