

Available Waiver for Timely Documentation

Community Behavioral Health (CBH) currently requires clinical documentation to be complete and entered into the chart at the time of billing/claims submission or within seven days of the date of service, whichever occurs first. Services for which the documentation does not adhere to this requirement are considered invalid, and associated claims payments are considered overpayment and therefore subject to recoupment.

Some providers have indicated that a modification of these requirements would be beneficial for services delivered during the COVID-19 emergency declaration.

CBH Compliance will consider waivers to the seven-day requirement on a case-by-case basis for ambulatory-based services. Waivers may **NOT** be applied retroactively. All waiver requests should be sent to CBH.ComplianceContact@phila.gov. Please include “Timely Note Completion Waiver Request” in the subject line. Each waiver must include the following information, at a minimum:

- ➔ Duration the waiver is needed
 - This should include service start and end dates to be covered by the waiver
 - The duration of the waiver will not extend beyond the Commonwealth’s COVID-19 emergency declaration
- ➔ Statement of acknowledgement that the waiver will only be valid from the date of CBH approval forward (no retroactive waivers)
- ➔ Reason the waiver is needed
- ➔ Due date (replacing the seven-day window for completion of documentation) during waiver period

Waivers for timely note completion will **NOT** be considered for per diem/residential providers. Timely Documentation Waivers, if approved, will only apply to CBH’s timeframe requirements. Providers must still adhere to applicable Commonwealth and Federal rules and regulations.