What’s Up, CBH Compliance?

Some of our adaptations to COVID staying around for 2021

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2. Recoveries
3. Education
What’s Up, CBH Compliance?

Some of our adaptations to COVID staying around for 2021

1. Auditing
2. Recoveries
3. Education
COVID FRAUD
Be Alert For Common COVID Frauds/Risks

A. Lab Related
   - Fake/Unlicensed Labs
   - Unnecessary Add-Ons/Labs
B. Cyber Threats
C. Identity Theft
D. Medical Equipment
E. ‘Bogus’ Treatments
Be Alert For Common COVID Frauds/Risks

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REGULATORY CHANGES
OMHSAS COVID Response

**Licensing Changes**

✓ Suspended Licensing Visits

**Education/Information**

✓ FAQs

✓ Guidance
OMHSAS COVID Response

Regulatory Suspensions/Flexibility

✓ October 2020 Bulletin
✓ Updates February 2021
✓ APA payments
Federal COVID Response

✓ CMS Blanket Waivers
  - Initial March 2020
  - Update May 2021

✓ OCR HIPAA Enforcement Discretion
  - March 28, 2020 Announcement
CBH COMPLIANCE
CBH COVID Response

✓ Audit Suspension
✓ Overpayment Recoveries
✓ APA
FWA LIFE POST-COVID
What’s Next?

✓ Regulatory Changes
✓ Provider Changes/Challenges
✓ CBH Compliance Changes
What’s Next?

✓ Regulatory Changes

✓ Provider Changes/Challenges

✓ CBH Compliance Changes
What’s Next?

✓ Regulatory Changes
✓ Provider Changes/Challenges

✓ CBH Compliance Changes
Network Staffing: Applying for a CBH Waiver

CBH is on par with the Commonwealth for most positions
Commonwealth requirements cannot be waived
All waiver requests reviewed by the Credentialing Committee
Expedited due to staffing shortage
Cannot be retroactive
Individual (person specific) or institutional (position specific)
Applying for a CBH Waiver: Individual

Position
Rationale
Projected DOH
Resume/CV
Transcript of highest education
Training plan
Supervision plan
Applying for a CBH Waiver: Institutional

Positions
Rationale
Projected DOH
General description of cohort (education / experience)
Number of potential employees
Training plan
Supervision plan
TAKE-AWAYS
<table>
<thead>
<tr>
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<th>Key Points</th>
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<tbody>
<tr>
<td>1</td>
<td>COVID initiated rapid and sweeping adaptations</td>
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<tr>
<td>2</td>
<td>Key oversight entities and payers moved consistently to prioritize care in crisis</td>
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<td>3</td>
<td>Monitoring of COVID fraud will continue for some time</td>
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<td>4</td>
<td>Providers must plan for a rebound in utilization</td>
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<tr>
<td>5</td>
<td>CBH Compliance will, to the extent possible, continue to support providers</td>
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RESOURCES
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**FTC Release on Identity Theft**

https://www.consumer.ftc.gov/blog/2021/02/identity-theft-awareness-week-starts-today

**DOJ Page on Combatting COVID Fraud**

https://www.justice.gov/coronavirus/combatingfraud

**FDA Caution on Treatments**

RESOURCES

Pa DHS Behavioral Health FAQ


State Guidance on Finger Printing

https://www.dhs.pa.gov/coronavirus/Pages/FAQ-Fingerprinting.aspx

OMHSAS Regulatory Suspensions

https://www.dhs.pa.gov/coronavirus/Pages/OMHSAS-Temporary-Suspension-Specified-Regulatory-Requirements.aspx
RESOURCES

**OCR HIPAA Bulletin (3/2020)**


**COVID Paycheck Protection Fraud Sentencing**


**CBH Provider Manual**

RESOURCES

Manual for Review of Provider Personnel Files (MRPPF)*


* = Link leads to MRPPF current at time of presentation, please connect through Provider Manual to ensure most current version
CBH Contacts

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Mark Miller, Compliance Supervisor, Mark.D.Miller@phila.gov

General contact, CBH.ComplianceContact@phila.gov
TO REPORT POTENTIAL FRAUD, WASTE, or ABUSE

CBH Compliance Hotline

PHONE: 1-800-229-3050

EMAIL: CBH.Compliancehotline@phila.gov

Pennsylvania DHS Tips (BPI)

PHONE: 1-844-347-8477
QUESTIONS