



# COVID and Beyond



City of  
Philadelphia

2021 CBH Compliance Forum  
November 9, 2021



2021

2021



# What's Up, CBH Compliance?

Some of our adaptations to COVID staying around for 2021

1


Auditing

2

Recoveries

3

Education





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# COVID FRAUD

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*

A. Lab Related

## **B. Cyber Threats**

C. Identity Theft

D. Medical Equipment

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## *Be Alert For Common COVID Frauds/Risks*

- A. Lab Related
- B. Cyber Threats

## **C. Identity Theft**

- D. Medical Equipment
- E. 'Bogus' Treatments





## *Be Alert For Common COVID Frauds/Risks*

- A. Lab Related
- B. Cyber Threats
- C. Identity Theft

## **D. Medical Equipment**

- E. 'Bogus' Treatments
- 



## *Be Alert For Common COVID Frauds/Risks*

- A. Lab Related
- B. Cyber Threats
- C. Identity Theft
- D. Medical Equipment

# E. 'Bogus' Treatments





# REGULATORY CHANGES

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# 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 COMPLIANCE





# CBH COVID Response

- ✓ Audit Suspension
  - ✓ Overpayment Recoveries
  - ✓ *APA*
- 



# FWA LIFE POST-COVID

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

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# *Key Points*


1 COVID initiated rapid and sweeping adaptations

2 Key oversight entities and payers moved consistently to prioritize care in crisis

3 Monitoring of COVID fraud will continue for some time

4 Providers must plan for a rebound in utilization

5 CBH Compliance will, to the extent possible, continue to support providers





# RESOURCES

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## RESOURCES

### ***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***

<https://www.fda.gov/consumers/consumer-updates/beware-fraudulent-coronavirus-tests-vaccines-and-treatments>





## RESOURCES

### ***Pa DHS Behavioral Health FAQ***

<https://www.dhs.pa.gov/coronavirus/Pages/FAQS-Behavioral-Health.aspx>

### ***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)***

<https://public3.pagefreezer.com/content/HHS.gov/31-12-2020T08:51/https://www.hhs.gov/about/news/2020/03/28/ocr-issues-bulletin-on-civil-rights-laws-and-hipaa-flexibilities-that-apply-during-the-covid-19-emergency.html>

### ***COVID Paycheck Protection Fraud Sentencing***

<https://www.justice.gov/opa/pr/two-individuals-sentenced-covid-19-relief-fraud>

### ***CBH Provider Manual***

<https://cbhphilly.org/cbh-providers/oversight-and-monitoring/cbh-provider-manual/>





## RESOURCES

### ***Manual for Review of Provider Personnel Files (MRPPF)\****

[https://cbhphilly.org/wp-content/uploads/2021/07/CBH\\_Manual\\_for\\_Review\\_of\\_Provider\\_Personnel\\_Files\\_MRPPF\\_2\\_5\\_draft\\_2021-07-19.pdf](https://cbhphilly.org/wp-content/uploads/2021/07/CBH_Manual_for_Review_of_Provider_Personnel_Files_MRPPF_2_5_draft_2021-07-19.pdf)

*\* = 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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# TO REPORT POTENTIAL FRAUD, WASTE, or ABUSE

## **CBH Compliance Hotline**

PHONE: 1-800-229-3050

EMAIL: [CBH.Compliancehotline@phila.gov](mailto:CBH.Compliancehotline@phila.gov)

## ***Pennsylvania DHS Tips (BPI)***

PHONE: 1-844-347-8477





# QUESTIONS

QUESTIONS