

C·B·H

# Program Integrity Audit Pitfalls

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# Background

**What?**

**Why?**

**How?**

- Defining Program Integrity
- Purpose of our department
- Program Integrity Activities

# Overview: PI Audits

- Types of Audits
  - Educational
  - Probe
  - Targeted
  - Announced vs. Unannounced
- Audit Procedures
  - Requests for information
  - Accessing Clinical Records
  - Applying Audit Codes

# Audit Codes

Code	Description
B	Billing Error
C	Case Rate Threshold Not Met
D	Discrepant Information
E	Services Provided an Excluded Individual or Entity
G	Group Size Not Noted or Exceeds Allowable Number of Participants
H	Upcoding
IC	Insufficient: Content
ID	Insufficient: Documentation
M	Missing Documentation
N	Non-Billable Activity
P	Services Exceed Allowable Contacts Per Time Period
Q	Services Provided by an Unqualified Individual
R	Re-use of Content
S	Services Not Rendered
T	Treatment Plan concerns
U	Unit Error
Y	Unbundling Codes
Z	Lack of Medical Necessity

# Pitfall #1

## An Ineffective Compliance Program

- Unclear expectations
  - No policies & procedures
  - Training gaps for staff
- No oversight & internal monitoring
  - Lack of supervision
  - No self-auditing
  - No Service Verification
- Lacking a 'Culture of Compliance'
  - Lack of accountability
  - Poor communication

# Pitfall #2

## Not knowing the rules

- Lacking knowledge of the Federal & State regulations
- Non- compliance with CBH requirements
- Unqualified or Excluded staff

# Pitfall #3

## Improper Billing

- Billing the incorrect service type
- Billing the incorrect place of service (POS)
- Billing for non-covered services
- Upcoding

(Please note, this list is not exhaustive)

# Pitfall #4

## Poor Documentation

- Missing documentation
- Notes without clock times, signatures, member identifying info, etc.
- Late entries
- Insufficient content
- Treatment Plan concerns

(Please note, this list is not exhaustive)



# **Pitfall #5**

## **Falsifying documentation or Services not rendered**

- Discrepant information
  - Inconsistent information documented
  - Overlapping clock times for services
  - Completing, signing, and/or entering notes during service delivery
- Forging signatures
- Billing for services not rendered

(Please note, this list is not exhaustive)

# **RECAP:**

## **Avoiding Audit Pitfalls**

- Maintain an effective compliance program
- Continuous internal monitoring
- Know the rules
- Document, document, document
- Submit accurate billing



# Thank You!

If you suspect any type of fraud, waste, or abuse by a Community Behavioral Health (CBH) member or employee, or by a behavioral healthcare provider, you may call the CBH Compliance Hotline or send an email to the Program Integrity Department to make a **CONFIDENTIAL** report.

**Call: 1-800-229-3050**

**OR**

**email: [CBH.compliancehotline@phila.gov](mailto:CBH.compliancehotline@phila.gov)**