



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