

Program Integrity Updates & Reminders

Thursday, November 6, 2025

PRESENTED BY:

Emily M Miller

Program Integrity Team Leader

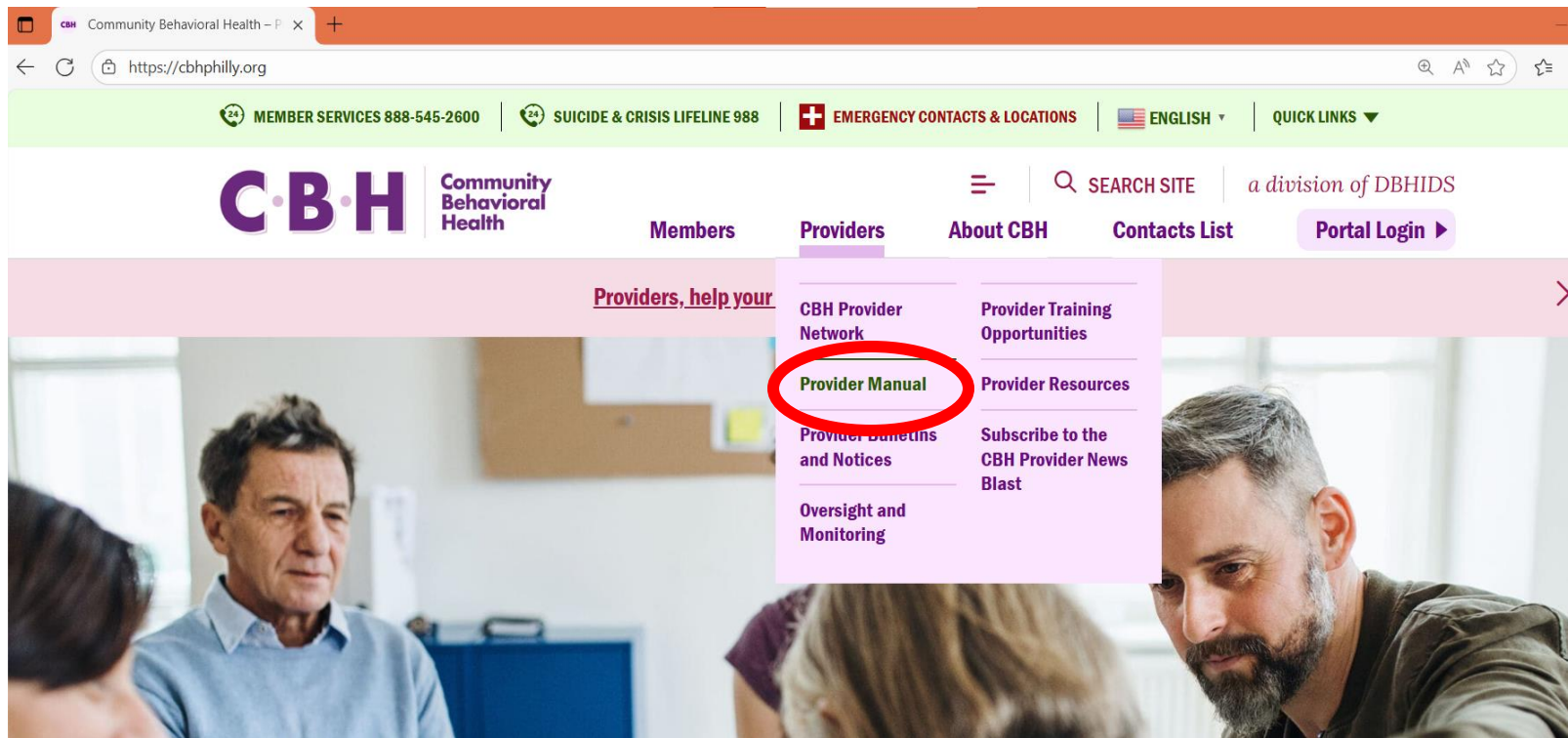
Maria Perkins

Program Integrity Business Rules Leader

Where to find CBH Provider Manual & Additional Documents

STEP 1:

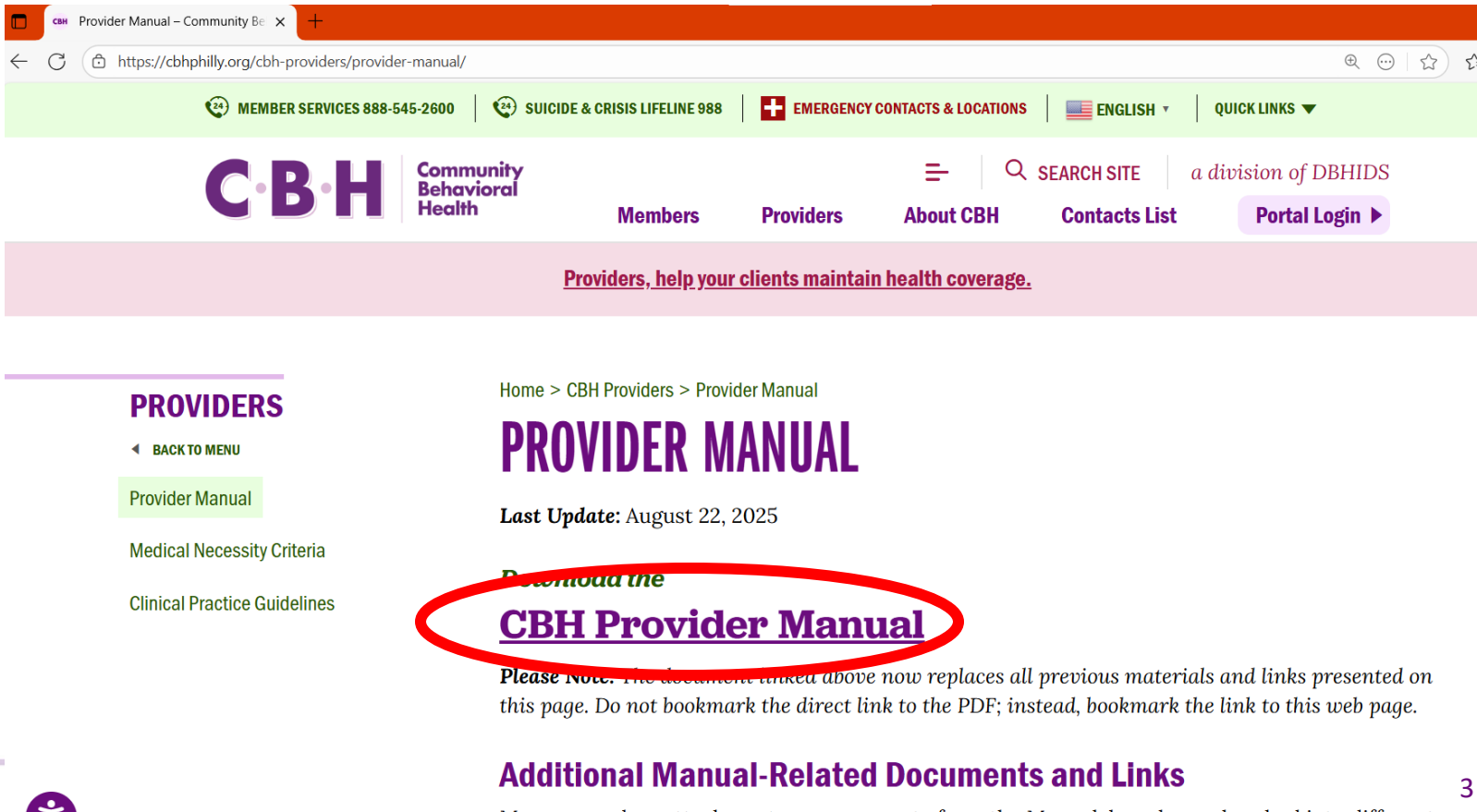
Hover
Mouse
over
Providers
on menu.
When
purple
sub-menu
appears
click on
**Provider
Manual.**



Where to find CBH Provider Manual & Additional Documents

STEP 2:

Click
CBH
Provider
Manual
and a PDF
file will
open in
another
tab.



The screenshot shows the CBH (Community Behavioral Health) website. The browser address bar displays 'https://cbhphilly.org/cbh-providers/provider-manual/'. The website header includes a green navigation bar with links for 'MEMBER SERVICES 888-545-2600', 'SUICIDE & CRISIS LIFELINE 988', 'EMERGENCY CONTACTS & LOCATIONS', 'ENGLISH', and 'QUICK LINKS'. Below this is a white navigation bar with the CBH logo, 'Community Behavioral Health', and links for 'Members', 'Providers', 'About CBH', 'Contacts List', and a 'Portal Login' button. A pink banner below the navigation bar reads 'Providers, help your clients maintain health coverage.' The main content area has a purple sidebar on the left with the heading 'PROVIDERS' and a 'BACK TO MENU' link. Under 'PROVIDERS', there are three links: 'Provider Manual' (highlighted with a green background), 'Medical Necessity Criteria', and 'Clinical Practice Guidelines'. The main content area on the right has a breadcrumb trail 'Home > CBH Providers > Provider Manual' and a large purple heading 'PROVIDER MANUAL'. Below this heading, it says 'Last Update: August 22, 2025'. A red circle highlights the link 'Download the CBH Provider Manual'. Below this link, a 'Please Note' section states: 'The document linked above now replaces all previous materials and links presented on this page. Do not bookmark the direct link to the PDF; instead, bookmark the link to this web page.' At the bottom, there is a section titled 'Additional Manual-Related Documents and Links'.

Provider Manual – Community Be x

https://cbhphilly.org/cbh-providers/provider-manual/

MEMBER SERVICES 888-545-2600 | SUICIDE & CRISIS LIFELINE 988 | EMERGENCY CONTACTS & LOCATIONS | ENGLISH | QUICK LINKS

C.B.H. Community Behavioral Health

Members Providers About CBH Contacts List Portal Login ▶

Providers, help your clients maintain health coverage.

Home > CBH Providers > Provider Manual

PROVIDER MANUAL

Last Update: August 22, 2025

Download the CBH Provider Manual

Please Note. The document linked above now replaces all previous materials and links presented on this page. Do not bookmark the direct link to the PDF; instead, bookmark the link to this web page.

Additional Manual-Related Documents and Links

Where to find CBH Provider Manual & Additional Documents

Additional Documents :

Scroll down on Provider Manual webpage and click **+** (plus signs) to expand menu and display documents.

The screenshot shows a web browser window with the address bar displaying <https://cbhphilly.org/cbh-providers/provider-manual/>. The page header includes the C·B·H logo, the text "Community Behavioral Health", a search bar labeled "SEARCH SITE", and "a division of DBHIDS". The main content area contains a paragraph: "this page. Do not bookmark the direct link to the PDF; instead, bookmark the link to this web page." Below this is a section titled "Additional Manual-Related Documents and Links". Under this section, there is a list of documents: "Credentialing", "Authorizations", "Quality", and "Program Integrity". Each document name is followed by a plus sign (+) in a circle, indicating it can be expanded. The "Program Integrity" document and its plus sign are circled in red. In the bottom right corner, there is a logo for "Community Behavioral Health" and the website address "CBHPHILLY.ORG".

Provider Manual – Community Be x +

← ↻ <https://cbhphilly.org/cbh-providers/provider-manual/> 🔍 ☺ ☆

C·B·H Community Behavioral Health

≡ 🔍 SEARCH SITE a division of DBHIDS

this page. Do not bookmark the direct link to the PDF; instead, bookmark the link to this web page.

Additional Manual-Related Documents and Links

Many secondary attachments, once separate from the Manual, have been absorbed into different sections, such as the Clinical Documentation Requirements found in the new Program Integrity section (Section 5). Moving forward, all documents, guidelines, and forms referenced throughout the CBH Provider Manual will be housed and linkable below through this webpage.

- Credentialing +
- Authorizations +
- Quality +
- Program Integrity +

Community Behavioral Health
CBHPHILLY.ORG

Provider Bulletins & Provider Notices

CBH Provider Bulletins

- considered updates to the Provider Agreement
- change in clinical programming standard, billing, or other business practice
- time-sensitive & financial impact

CBH Provider Notices

- remind our provider network of expectations
- reinforce a standard that is currently in place
- share an important update

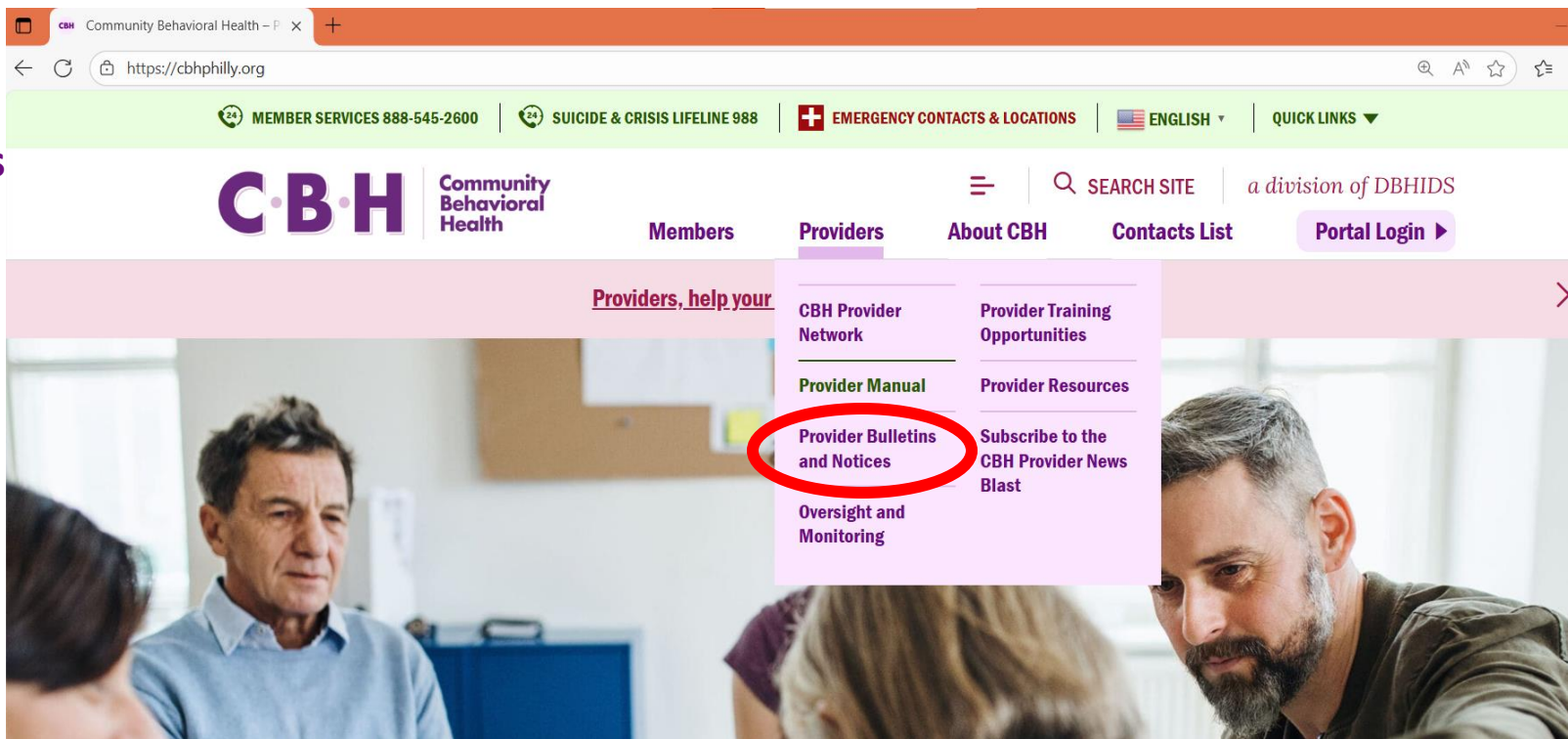
Where to Find Provider Bulletins & Notices

STEP 1:

Hover Mouse
over **Providers**
on menu.

When purple
sub-menu
appears click
on

**Provider
Bulletins and
Notices.**



Where to Find Provider Bulletins & Notices

STEP 2:

Scroll down on to applicable year and click **+** (plus signs) to expand menu and display documents.

Provider Bulletins and Notices - C x +

https://cbhphilly.org/cbh-providers/provider-bulletins/

PROVIDERS

- CBH Provider Network ▶
- Provider Manual ▶
- Provider Bulletins & Notices**
- Oversight and Monitoring ▶
- Provider Training Opportunities
- Provider Resources ▶
- Subscribe to the CBH Provider News Blast

PROVIDER BULLETINS AND NOTICES

Please see below for all bulletins and notices issued by Community Behavioral Health.


For Medicaid and OMHSAS bulletins posted by the PA Department of Human Services, please visit the [Medicaid Bulletin Search page](#).

Get the latest bulletins, announcements, and trainings.

Sign up for the twice-weekly CBH Provider News Blast.

CBH Bulletins

2025 Bulletins	+
2024 Bulletins	+
2023 Bulletins	+



Health
ILLY.ORG

Where to Find Provider Bulletins & Notices

STEP 2:

Scroll down on to applicable year and click **+** (plus signs) to expand menu and display documents.

The screenshot shows the CBH (Community Behavioral Health) website page for Provider Bulletins and Notices. The URL in the browser is <https://cbhphilly.org/cbh-providers/provider-bulletins/>. The page features a header with the CBH logo, a search bar, and the text "a division of DBHIDS". The main content area is titled "CBH Notices" and lists notices for various years. The "2025 Notices" link is circled in red, and the expand button (+) next to it is also circled in red. The list of notices includes:

- 2025 Notices (+)
- 2024 Notices (+)
- 2023 Notices (+)
- 2022 Notices (+)
- 2021 Notices (+)
- 2020 Notices (+)
- 2019 Notices (+)
- 2018 Notices (+)

The footer of the page includes a person icon and the text "il Health PHILLY.ORG".

2025 CBH Provider Bulletins (32* as of 10/24/25)

- 25-01 Provider Manual updates
- 25-06- ASAM 3.5
- 25-10 Recredentialing Changes
- 25-14 Provider Responsibility to Cooperate and Comply with CBH Program Integrity Activities
- 25-15 Open Network Limitations
- 25-27 Non-Fidelity ACT Name Change
- 25-32-ASAM Alignment
- Multiple for IBHS/ABA: 3,4,5,8,19,20,24,25

*the list on this slide is not exhaustive

2025 CBH Provider Notices (43* as of 10/24/2025)

1/28- Box Sign

1/30- CBH Personnel Roster Template

5/8- CBH Personnel Roster Template Reminder

5/13- Use of Artificial Intelligence (AI)

6/3- Revisions to the CBH Policy Requirements for Initial and Recredentialing of Facilities

6/30- Fraud Alert: Phishing/Spoofing Fax Scam Targeting Providers from CMS

7/3- Self-Auditing Process for CBH Providers

8/12- Discontinuation of Open Network

8/25- Provider Guidelines for the Use of Artificial Intelligence (AI)

9/26- CBH Provider Directory Review

10/2- Use of Out-of-Network Provider

10/7- Intent to Issue a Clinical Procurement

10/9- Expansion of Ancillary (Lab) Service Provider

10/14- IBHS/ABA Realignment Update

*the list on this slide is not exhaustive

Telehealth



- **Must be able to provide in-person services if the member requests in-person**
- **Progress Notes should document:**
 - Member's consent for session to be held via telehealth
 - Whether it is audio or audio/visual
 - If only audio reason why
 - Platform used
- **OMHSAS Behavioral Health Telehealth Information**
<https://www.pa.gov/agencies/dhs/resources/mental-health-substance-use-disorder/omhsas-behavioral-health-telehealth.html>
- **CBH Telehealth Best Practices**
https://cbhphilly.org/wp-content/uploads/2022/10/CBH_Best-Practices_Telehealth_2024-11.pdf

Electronic Records



- **Ease paperwork burden**
- **Reduce risk of missing documentation**
- **Could help ensure required elements are present**
- **Could help ensure more accurate billing**
- **Ensure consistent training on utilization**
- **Internally monitor for accuracy**
- **Be aware of privacy and security requirements**

Encounter Forms



- **MA requirement (MA Bulletin 99-89-05)**
 - Applicable to In & Out-of Network
 - Applicable to telehealth
 - Has required elements & attestation
- **Signature of recipient confirming the service was received**
 - Ideally at the end of the session
 - by recipient over 14 or when under 14 a recipient's agent such as a teacher or parent
 - Cannot be staff from same agency
 - Electronic Signatures need auditable trail
 - Verbal Consent only permissible under signature exceptions listed in MA Bulletin 99-89-05
- **MA Bulletin 99-89-05 ("d 006319"):**
http://www.dhs.pa.gov/cs/groups/webcontent/documents/bulletin_admin/d_006319.pdf

C·B·H

Artificial Intelligence: An Update

Definition - What is Artificial Intelligence or AI?

The term “artificial intelligence” means a machine-based system that can, for a given set of human-defined objectives, make predictions, recommendations, or decisions influencing real or virtual environments.

(15 USC § 9401(3))

AI Guidelines

- The use of AI does not alter or lessen federal, state, local, or CBH requirements and guidelines
- All AI applications **must** be HIPAA-compliant.
- If AI is used, a human/staff member must review the documentation. The provider staff and/or agency is responsible for the accuracy and appropriateness of the content.
- It is important to note that CBH does not allow any offshore storage of PHI.
- CBH does not allow AI bots (e.g., ChatGPT, Microsoft Copilot, Google Gemini, Grok, etc.) in any virtual meeting platform

Be aware of Bias

- How is your AI application normed?
- Implementing Bias Monitoring if utilizing AI: having a framework to monitor and address bias



Pennsylvania AI Policy

- **4.1.1 Decision Making** – evaluate how much decision making you want AI to make
- **4.1.3 Methodology** – AI solutions need regular and ongoing review to yield the best results
- **4.1.4 Audit** – ensuring accuracy.
 - AI solutions that are used to formulate decisions regarding Direct/indirect material financial interests or transactions; administrative policy and program changes; benefits eligibility and determinations ; life-changing ; health, safety, and welfare of citizens or commonwealth employees are subject to audits
- **4.1.5 Disclosure** – ensuring the customer knows when/how AI is being utilized
- **4.1.6 Governance** – proper oversight to mitigate risk
- **4.2.6.4 Generative AI Decision Making** – Generative AI are not to be used for decision making

Implementing Data Privacy and Security Measures

- “To support the implementation of safety in AI systems, there must be protections preventing both physical and digital endangerment of human life, health, property, and the environment. This is achieved through responsible cybersecurity, development, and deployment practices from system owners as well as clear communication of responsible use and risks.” CMS Playbook
- Risk of cyberattacks
- HIPAA compliance

CBH AI References

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15 USC § 9401(3). Retrieved 10/22/2024 from:

- [https://uscode.house.gov/view.xhtml?req=\(title:15%20section:9401%20edition:prelim\)#:~:text=\(b\)%20The%20term%20%22artificial,influencing%20real%20or%20virtual%20environments](https://uscode.house.gov/view.xhtml?req=(title:15%20section:9401%20edition:prelim)#:~:text=(b)%20The%20term%20%22artificial,influencing%20real%20or%20virtual%20environments)

CMS Artificial Intelligence Playbook Version 4

- <https://ai.cms.gov/CMS-AI-Playbook.pdf>

Provider Guidelines for the Use of Artificial Intelligence (AI) 8/25/2025

- https://cbhphilly.org/wp-content/uploads/2022/10/CBH_Provider-Notice_2025-08-25_AI-Guidelines.pdf

Pennsylvania Office of Administration Artificial Intelligence Policy

- <https://www.pa.gov/content/dam/copapwp-pagov/en/oa/documents/policies/it-policies/artificial%20intelligence%20policy.pdf>

Pennsylvania Office of Administration Generative Artificial Intelligence Website

- <https://www.pa.gov/agencies/oa/programs/information-technology2/gen-ai>

C.B.H.

CBH Resources

CBH Website

- <https://cbhphilly.org/>

CBH Provider Manual (Section 5 for Compliance) & Important Documents

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

Provider Bulletins & Notices

- <https://cbhphilly.org/cbh-providers/provider-bulletins/>

CBH Oversight & Monitoring Webpage

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

CBH Program Integrity

- <https://cbhphilly.org/cbh-providers/oversight-and-monitoring/program-integrity/>

CBH Compliance Matters Newsletter Archive

- <https://cbhphilly.org/cbh-providers/oversight-and-monitoring/program-integrity/>

Compliance Forum Recordings

- <https://cbhphilly.org/cbh-providers/provider-training/>