



# Program Integrity Updates & Reminders

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**Thursday, November 6, 2025**

PRESENTED BY:

**Emily M Miller**

Program Integrity Team Leader

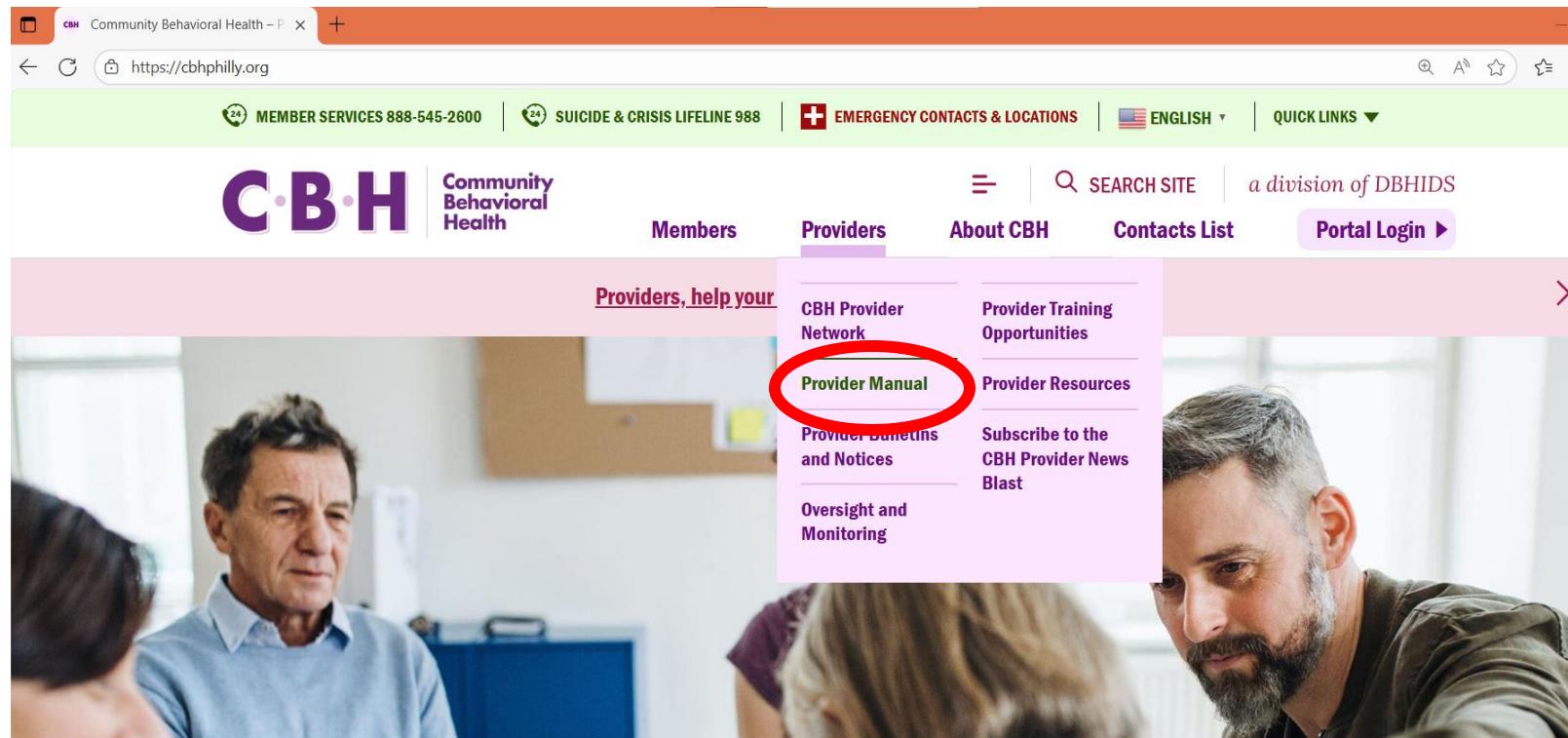
**Maria Perkins**

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**.

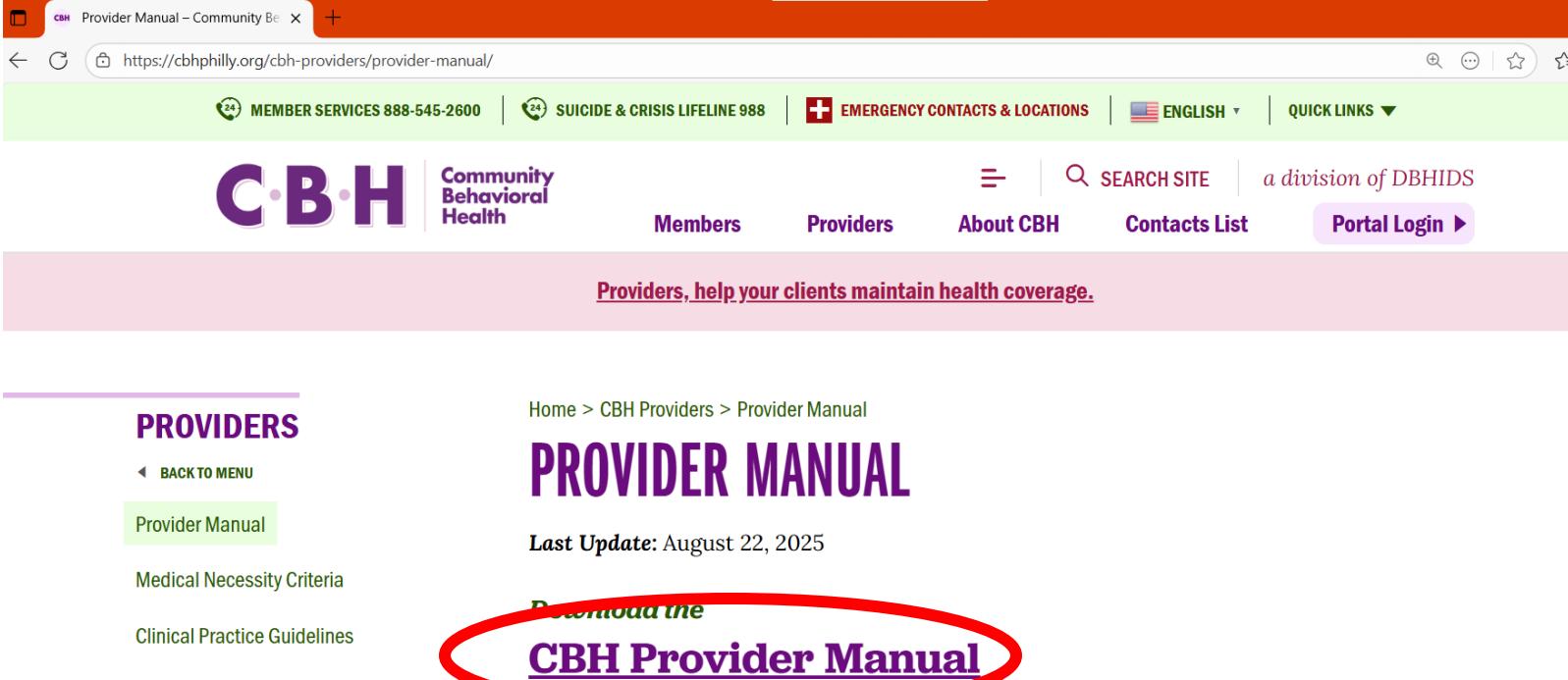


The screenshot shows the CBH website homepage. At the top, there is a navigation bar with links for MEMBER SERVICES (888-545-2600), SUICIDE & CRISIS LIFELINE (988), EMERGENCY CONTACTS & LOCATIONS, and a language selector for ENGLISH. On the right, there are links for QUICK LINKS and PORTAL LOGIN. The main menu includes options for MEMBERS, PROVIDERS (which is currently selected and highlighted in purple), ABOUT CBH, CONTACTS LIST, and PORTAL LOGIN. A sub-menu for PROVIDERS is open, showing links for CBH PROVIDER NETWORK, PROVIDER TRAINING OPPORTUNITIES, PROVIDER RESOURCES, PROVIDER BULLETINS AND NOTICES, and OVERSIGHT AND MONITORING. The link for PROVIDER MANUAL is highlighted with a red circle. The background of the page features a photograph of a group of people in an office setting.

# 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 website with the following details:

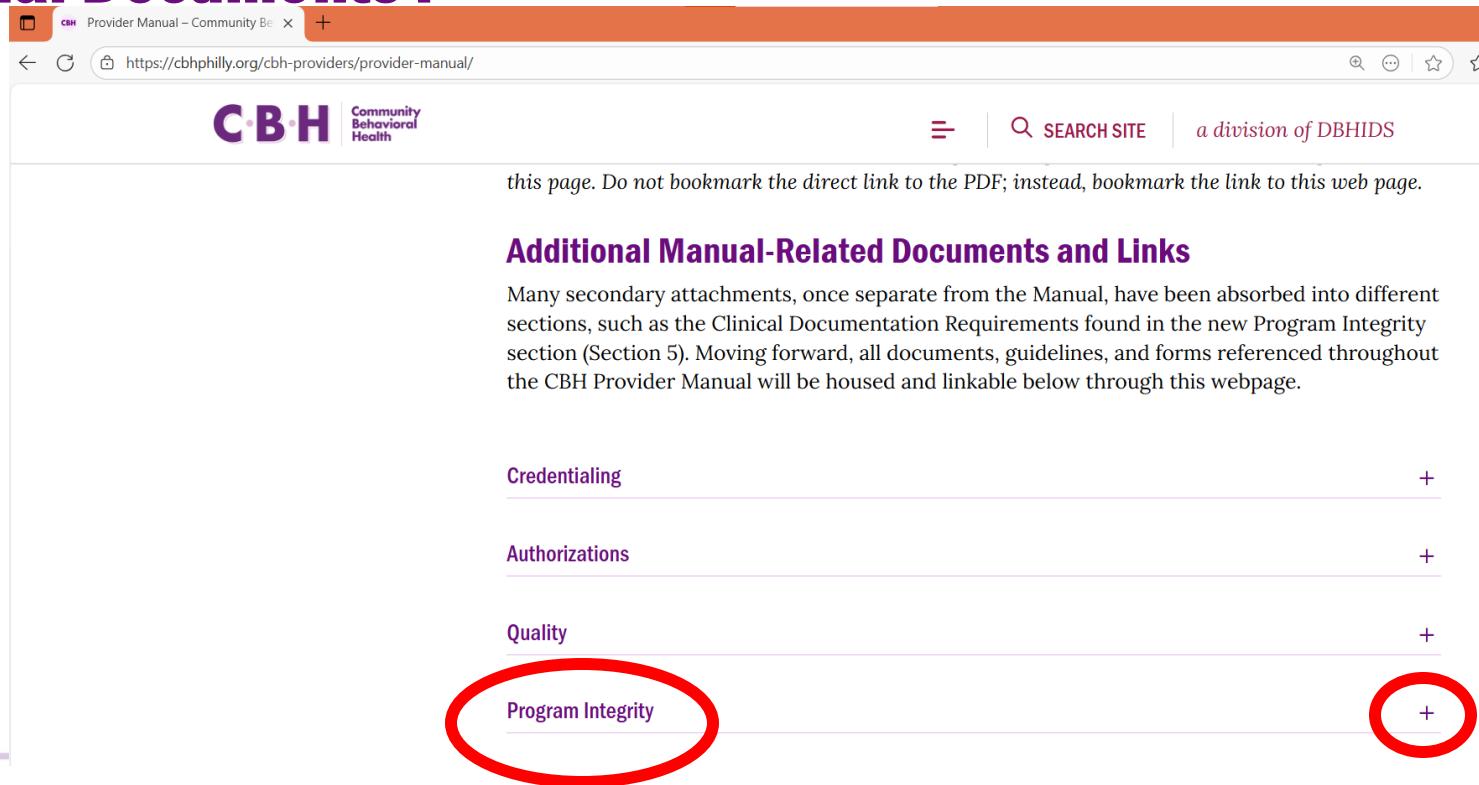
- Header:** CBH Provider Manual – Community Behavioral Health
- Page Address:** https://cbhphilly.org/cbh-providers/provider-manual/
- Top Navigation:** MEMBER SERVICES 888-545-2600, SUICIDE & CRISIS LIFELINE 988, EMERGENCY CONTACTS & LOCATIONS, ENGLISH, QUICK LINKS.
- Logo:** CBH Community Behavioral Health
- Menu:** Members, Providers, About CBH, Contacts List, Portal Login
- Text on Page:** Providers, help your clients maintain health coverage.
- Breadcrumbs:** Home > CBH Providers > Provider Manual
- Section:** PROVIDERS
- Links in sidebar:** BACK TO MENU, Provider Manual (highlighted in green), Medical Necessity Criteria, Clinical Practice Guidelines
- Section:** PROVIDER MANUAL
- Text:** Last Update: August 22, 2025
- Text:** Download the **CBH Provider Manual** (the text and the link are circled in red)
- Note:** 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.



Provider Manual – Community Behavioral Health

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

CBH 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

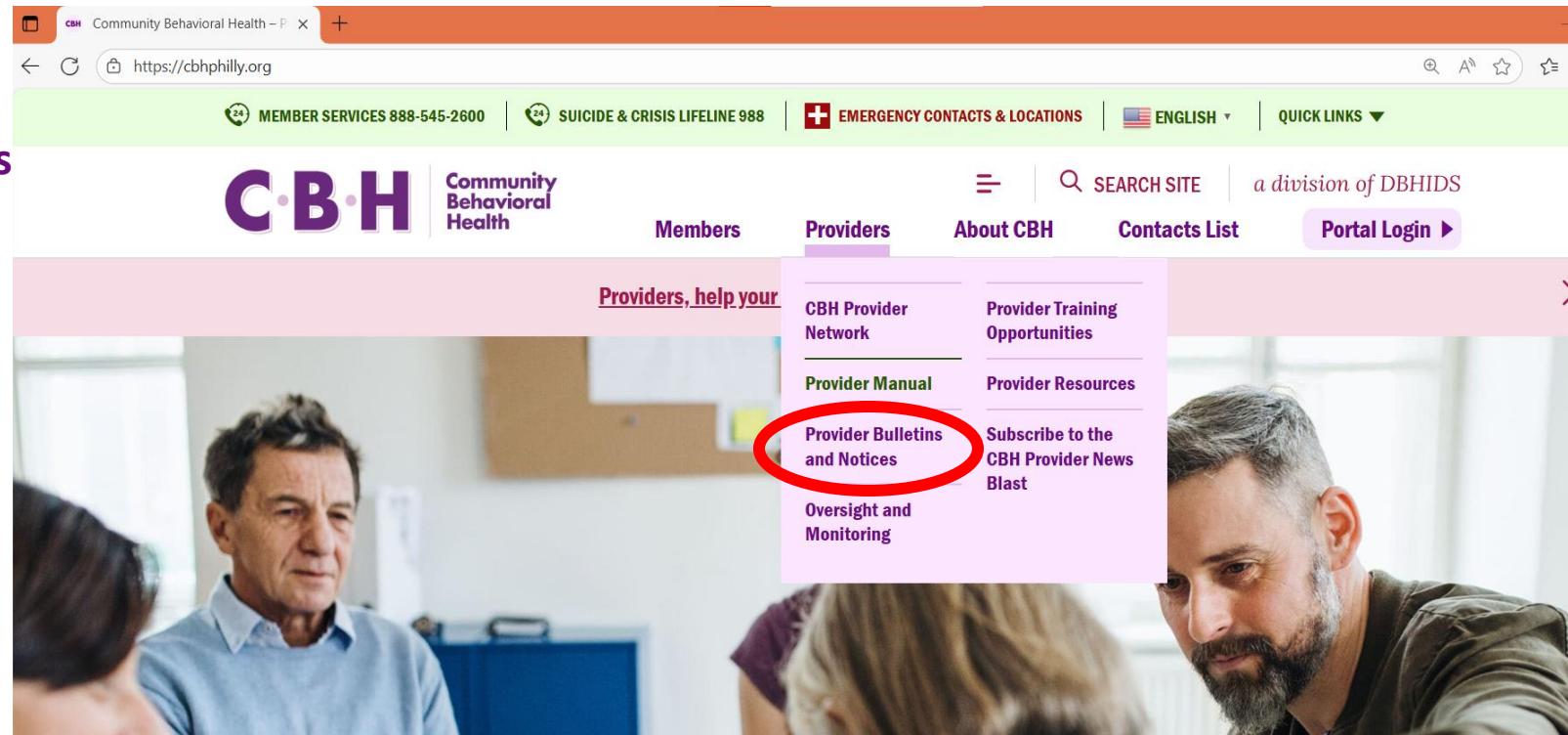
# Where to Find Provider Bulletins & Notices

## STEP 1:

Hover Mouse over **Providers** on menu.

When purple sub-menu appears click on

**Provider Bulletins and Notices.**



Community Behavioral Health – P

https://cbhphilly.org

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

Community Behavioral Health

Members

Providers

About CBH

Contacts List

Portal Login

Providers, help your

CBH Provider Network

Provider Training Opportunities

Provider Manual

Provider Bulletins and Notices

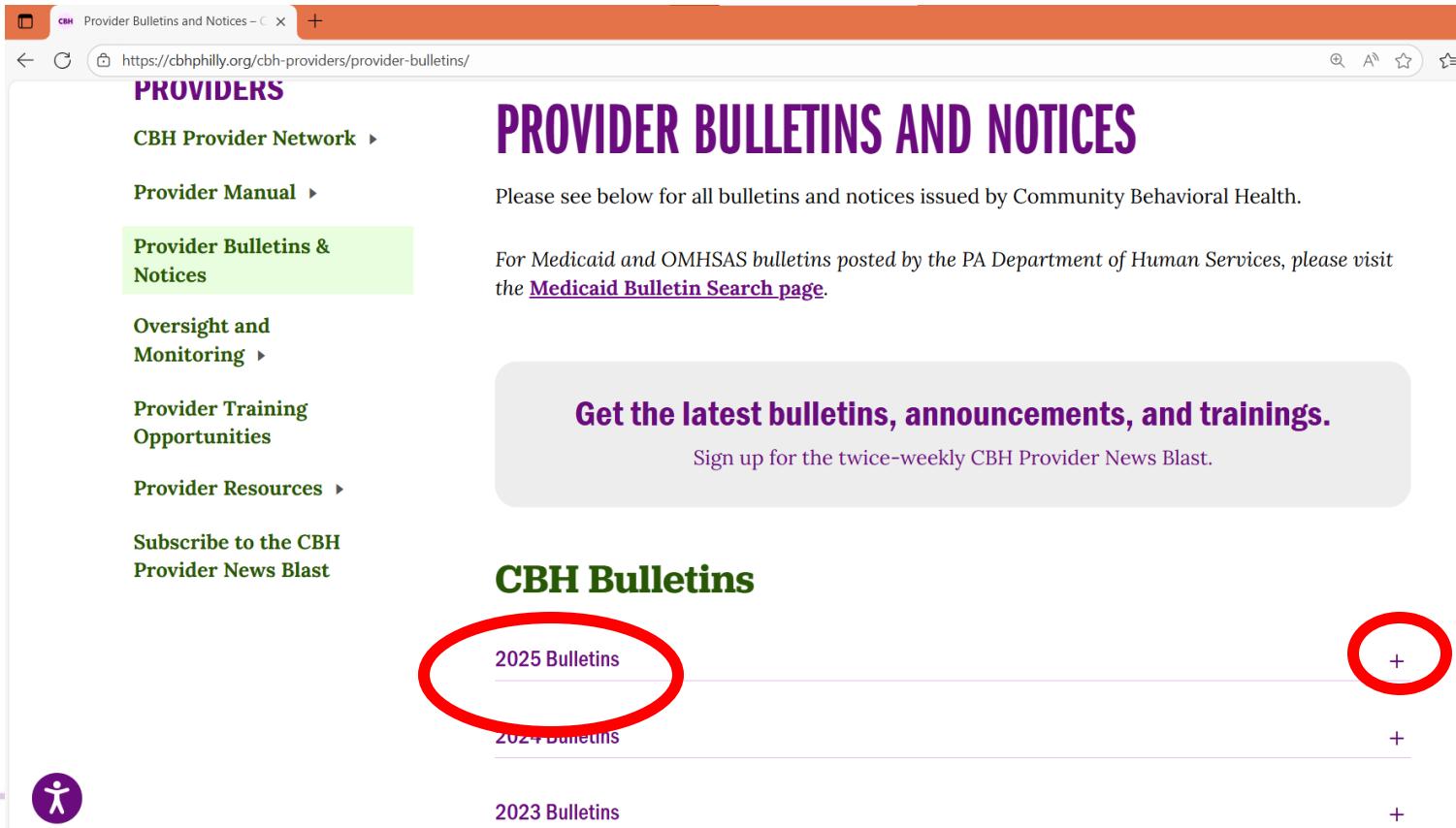
Subscribe to the CBH Provider News Blast

Oversight and Monitoring

# 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 a web browser window with the URL <https://cbhphilly.org/cbh-providers/provider-bulletins/>. The page is titled "PROVIDERS" and features a sidebar with the following menu items:

- CBH Provider Network
- Provider Manual
- Provider Bulletins & Notices** (highlighted in green)
- Oversight and Monitoring
- Provider Training Opportunities
- Provider Resources
- Subscribe to the CBH Provider News Blast

The main content area is titled "PROVIDER BULLETINS AND NOTICES" and contains the following text:

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** (circled in red)

**2024 Bulletins**

**2023 Bulletins**

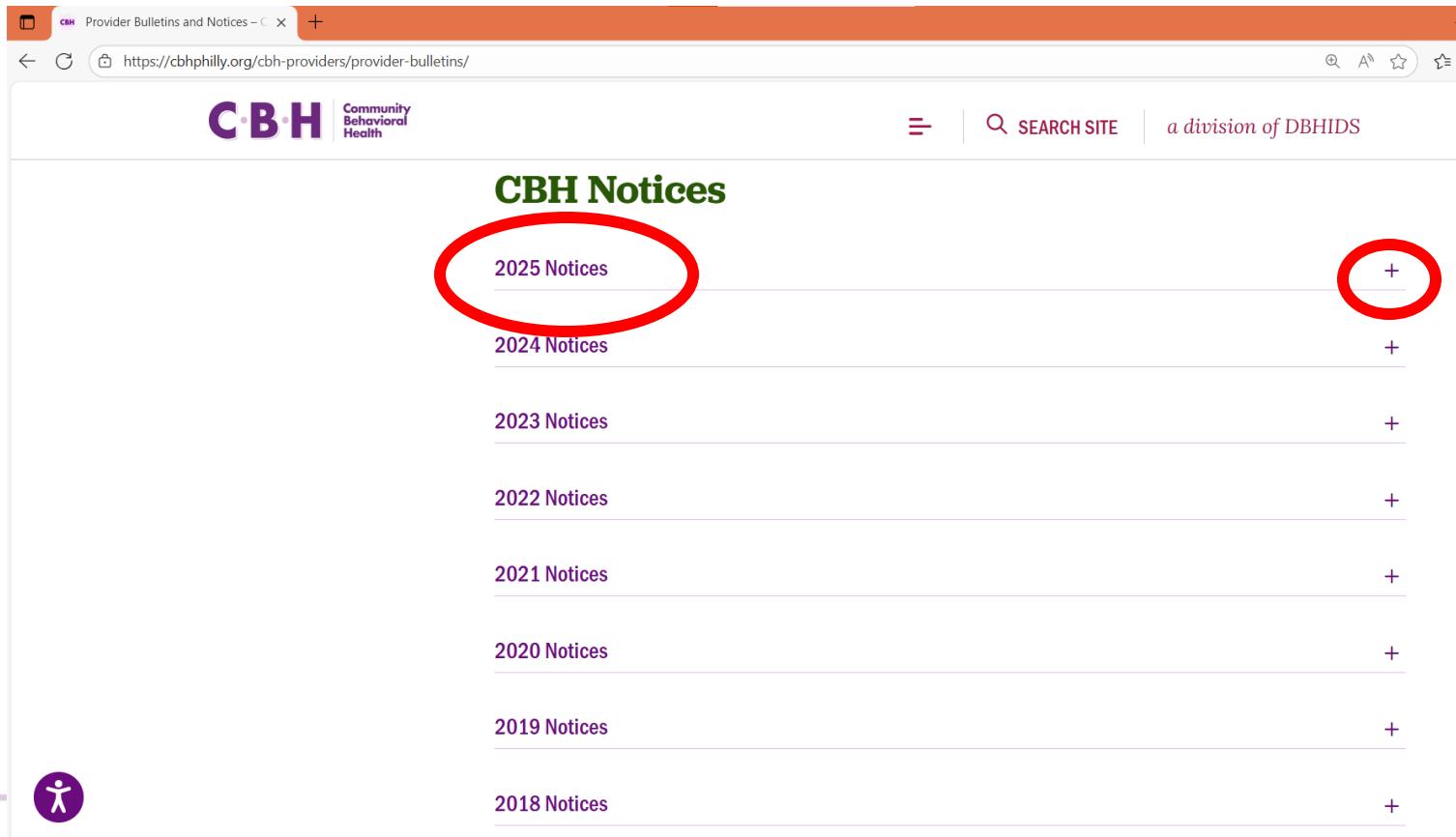
Health ILLY.ORG



# Where to Find Provider Bulletins & Notices

## STEP 2:

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



Provider Bulletins and Notices - CBH

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

CBH Community Behavioral Health

SEARCH SITE | a division of DBHIDS

### CBH Notices

- 2025 Notices
- 2024 Notices
- 2023 Notices
- 2022 Notices
- 2021 Notices
- 2020 Notices
- 2019 Notices
- 2018 Notices

CBH Community Behavioral 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](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](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.

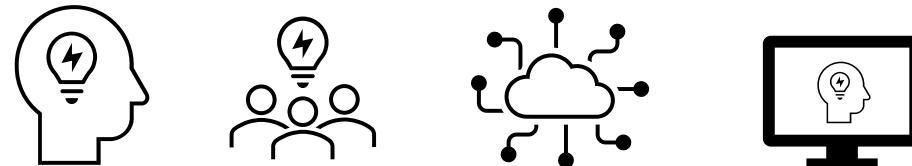
(15 USC § 9401(3))

# 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

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](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>

# 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/>