

Changes to Provider Agreement Relating to Use of Offshore Resources

This bulletin serves as an update to [Provider Bulletin 26-05](#), issued March 12, 2026, and as notice of an amendment to Section II.G. of the Provider Agreement as reflected below.

Effective July 30, 2026, in alignment with the City of Philadelphia Terms and Conditions Relating to Protected Health Information (“City PHI Terms”), CBH providers shall not disclose, transmit, or permit access to member PHI in any form or medium to any third party beyond the boundaries and jurisdiction of the United States without prior express written authorization from CBH.

Section II. Responsibilities of Provider.

G. Offshore Contracting. No Covered Services under this Provider Agreement may be performed outside of the United States without CBH’s prior written consent. In addition, Healthcare Provider will not hire any individual to perform any services under this Provider Agreement if that individual is required to have a work visa approved by the U.S. Department of Homeland Security and such individual has not met this requirement. Healthcare Provider shall notify CBH in advance of any use of an offshore subcontractor. Provider and Provider’s subcontracted vendors shall not disclose, transmit, or permit access to member PHI in any form or medium to any third party beyond the boundaries and jurisdiction of the United States without prior express written authorization from CBH. Any offshore access of PHI must have CBH’s prior written approval, and shall be strictly limited to the minimum necessary data for revenue cycle management (“RCM”) functions and subject to the following requirements:

- » Evidence of fully executed Business Associate Agreements (“BAA”), which must extend to all offshore subcontractors.
- » PHI is encrypted at rest (e.g., AES-256) and in transit (e.g., TLS 1.2+).
- » The printing, downloading, or caching of PHI on local offshore drives is strictly prohibited (i.e., no local storage). Virtual Desktop Infrastructure (“VDI”) is required.
- » Mandatory multi-factor authentication (“MFA”) for all offshore personnel accessing systems containing ePHI.
- » Strict role-based access control (“RBAC”) to ensure personnel can only access information required for their specific role.

CBH reserves the right to rescind its approval for Provider’s use of offshore resources at any time.

Please submit any questions or concerns to your assigned provider relations representative by July 30, 2026.