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# **Compliance Forum 2024: IBHS ABA Tour Follow-Up**

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PRESENTED BY:

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# Topics to be Covered



COMMUNITY BEHAVIORAL HEALTH

Introduction

Program Integrity and Auditing Details

Methodology

Preliminary Results and Themes

Next Steps

Resources

Discussion/Q&A

# Provider Notice

## Compliance Department IBHS ABA Tour

Beginning in the first quarter of 2024, the CBH Compliance Department will be conducting probe audits of Intensive Behavioral Health Services Applied Behavior Analysis (IBHS ABA) programs. Providers may receive two separate audits consisting of reviews of clinical charts and/or personnel records.

The Clinical Audit Team (CAT) will audit treatment records, encounter forms, and other documentation that supports billing for services. The CAT audit will consist of a random sample of claims.

The Network Personnel Analysis Unit (NPAU) will be reviewing staff files for required training, clearances, and staff qualifications.

IBHS ABA providers should expect to be contacted by Compliance team members to coordinate the audits in the near future.

## Types of Audits



Targeted Audits



Educational Audits



Probe Audits

## Targeted Audits

- **Targeted audits are focused audits of potential Fraud, Waste, and Abuse (FWA) concerns at provider/providers. The potential FWA concerns could be at client-level, clinician-level, staff-level (billers), program-level, or could involve the c-suite/leadership.**

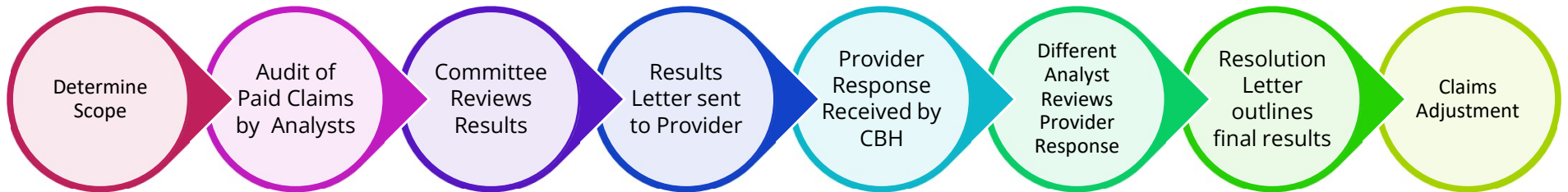
## Educational Audits

- **Educational audits are conducted for new providers or programs to mitigate documentation challenges. Educational audits review the comprehensiveness and sufficiency of clinical documentation as it relates to supporting the services provided. In educational audits, most observed errors will be reported as non-variance. Certain error types, i.e. missing documentation, services provided by unqualified staff, and services not rendered will always be considered an overpayment, and the financial impact is calculated accordingly.**

## Probe Audits

- **Probe audits are done typically to determine if there is an indication of billing or documentation issues. Probe audits involve a representative sample of records for the provider being reviewed. When the probe audit indicates the potential for specific or widespread billing problems for a provider or program, a recommendation for a targeted audit will be made.**

# IBHS ABA Audit Tour Process





# IBHS ABA Audit Tour Methodology

- **Overall, the CBH Program Integrity Department audited both in-network and out-of-network providers who submitted claims for March of 2023**
  - **Note that there was one provider who, when the data was collected via Rat-Stats (a statistical software package created by the Office of Inspector General), was not included in the sample**

# Overall Themes: Treatment Plan Concerns

- **Who is to sign the Treatment Plan**
  - **Staff member providing services, client if over 14 years of age and/or guardian/parent if under 14 years of age, staff member with the *qualifications to be a Clinical Director***

# Overall Themes: Non-Billable Activities

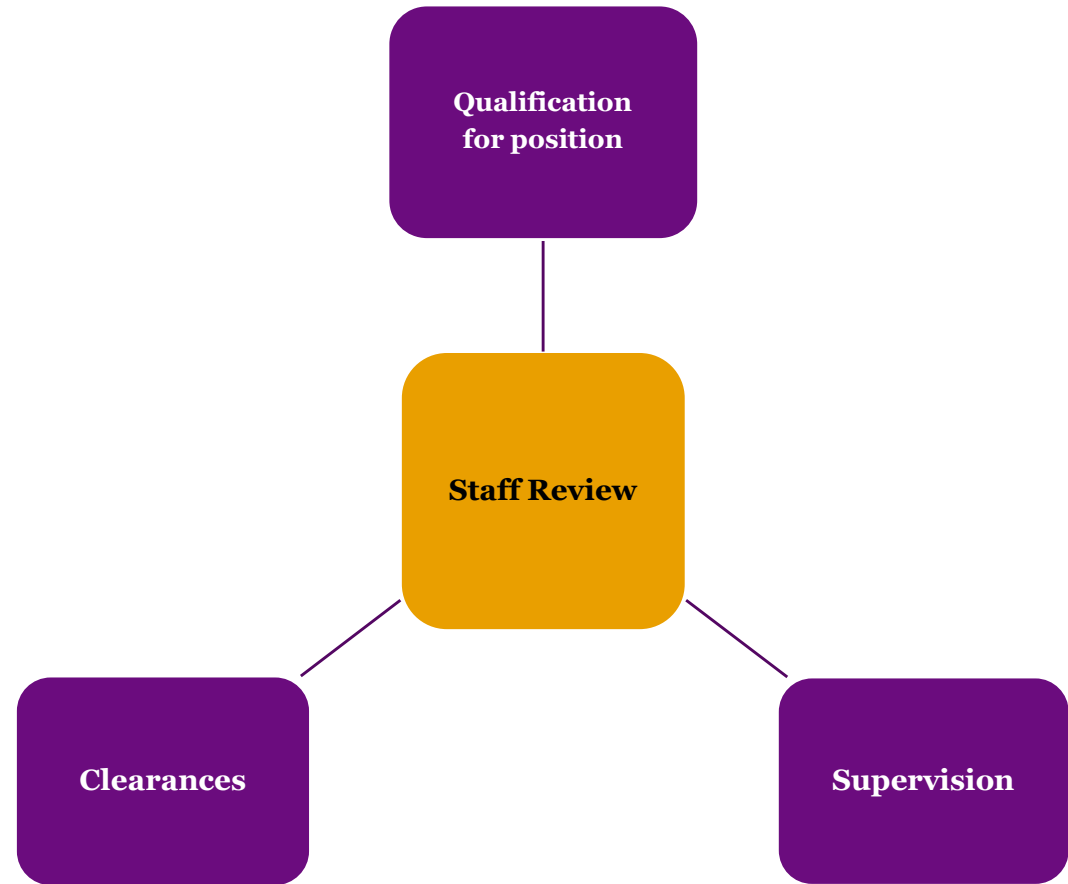
- **What activities are not Medicaid-reimbursable**
  - **Administrative tasks**
  - **Naps**
  - **Transportation to and from a location**
  - **Supervision**

**See IBHS Billing Guide for additional information about what is and is not billable.**

# Overall Themes: Insufficient Clinical

- **Documentation insufficient to support duration billed**
  - **Should include specific interventions, the client's reactions to those interventions, and a plan for the next session**
  - **Note should be detailed and have enough content to support duration billed**
    - *e.g. A note from 9am-3pm should have more than a few sentences*
  - **Clinical note should be tied in with listed treatment plan goals and interventions**

# Staffing Portion of Audit Tour



# Overall Themes: Documentation in Personnel Files

- **Up-to-date clearances**
- **Documenting qualifications**

# Overall Themes: Supervision Concerns

- **BHT supervision hours**
- **Qualifications of supervisors**
- **Documentation of supervision**
- **Max number of supervisees**

## Overall Themes: CBH-specific Requirements

- Performance-based competency assessments for BHTs
- Where CBH exceeds state regulations
  - All outlined in the [CBH Applied Behavior Analysis Performance Standards](#)



## Next Steps

- **Program Integrity will share outcomes with Clinical**
- **Review provider responses to their reports**
- **Determine provider needs**
- **Create documentation standards/guidelines for ABA providers**

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# Resources

## CBH Applied Behavior Analysis Performance Standards

- <https://cbhphilly.org/cbh-providers/provider-education-resources/aba/>

## CBH IBHS Billing Guide

- <https://cbhphilly.org/wp-content/uploads/2023/08/CBH-IBHS-Billing-Guide-2023-05.pdf>

## Behavior Analyst Certification Board Supervision and Training Information

- <https://www.bacb.com/supervision-and-training/>

## CBH Provider Manual

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

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# Discussion

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# **Fraud, Waste, and Abuse Hotline**

**1-800-229-3050**  
**[cbh.compliancehotline@phila.gov](mailto:cbh.compliancehotline@phila.gov)**

**Messages can be left 24/7**  
**Answered Live Weekdays 9-11am and 2-4pm**

# Fraud, Waste, and Abuse Hotline Referral

## **Helpful information to include when contacting the hotline:**

- **Nature of allegation**
- **Provider & Specific Staff involved**
- **Type of service**
- **Members involved & CIS number**
- **Time frame or dates of incident**
- **Caller's contact information, if they do not wish to remain anonymous**

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