



**Pascua Yaqui T/RBHA  
CENTERED SPIRIT PROGRAM  
Policy and Procedure Manual**

**Section 7.1**

**Fraud, Waste and Program Abuse Reporting**

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**I. STATEMENT OF PURPOSE**

The reporting a suspected fraud, waste, and program abuse is a requirement of the Arizona Department of Health Services, Division of Behavioral health Services (ADHS/DBHS) Corporate Compliance Program. Under those requirements, T/RBHAs and their subcontract providers are required to immediately notify the Arizona Health Care Cost Containment System (AHCCCS), office of the Inspector General (OIG) and ADHS/DBHS Bureau of Corporation Compliance (BCC) regarding any suspected fraud, waste, or program abuse involving AHCCCS, federal or state funds. ADHS/DBHS/BCC works closely with AHCCCS/OIG to address any referrals reported by providers in order to improve the system and promote accountability. This section does not include reporting of physical and sexual abuse regarding persons who have been determined to have a Serious Mental Illness (SMI). [Section 7.4, Reporting of Incidents, Accidents and Deaths](#) contains information for reporting abuse of persons determined to be SMI.

CSP passed a formal resolution to establish a corporate responsibility program in 1999. Under that resolution the program delegated the CSP Program Director as the corporate compliance officer. These standards set forth the mechanisms for detection and reporting of potential fraud, waste and program abuse to avoid the misappropriation of federal, state and local funds. As CSP functions as a TRBHA fraud is considered an act of intentional deception or misrepresentation committed by a person or behavioral health provider to gain an unauthorized benefit. Abuse committed by a behavioral health provider under this standard refers to activities that are inconsistent with standard fiscal business or medical practices and that result in unnecessary costs to the Arizona Health Care Cost Containment System (AHCCCS) and/or the Arizona Department of Health Services/Division of Behavioral Health Services (ADHS/DBHS) programs. Persons receiving care in the public health care system can also commit acts of abuse (e.g., by loaning or selling their AHCCCS identification card).



CSP and its subcontracted providers must be cognizant of potential fraud, waste, and program abuse within the public health system. When detected, behavioral health providers are obligated to report such occurrences to the appropriate TRBHA or state entity. Fraud, waste, and program abuse can result in the misuse of federal or state funds, can jeopardize the care and treatment of persons receiving behavioral health services and can result in monetary fines, criminal prosecution, the termination of providers and prohibition from participation in Medicare/Medicaid Programs. This section outlines the procedures for behavioral health providers to report potential cases of fraud and/or abuse.

## II. REFERENCES

The following PY/CSP Provider Manual Sections can serve as additional resources for this content area:

[Section 7.4, Reporting of Incidents, Accidents and Deaths](#)

The following ADHS/DBHS site also serves as a resource for this content area:

[42 CFR 438.608](#)

[A.R.S. § 36-2918.01](#)

[A.R.S. § 13-2310](#)

[AHCCCS/ADHS Contract](#)

[ADHS/RBHA Contracts](#)

[ADHS/TRBHA IGAs](#)

[AHCCCS Contractors' Operations Manual, Chapter 100, Section III. A](#)

[ADHS/DBHS Program Support Procedures Manual](#)

## III. STANDARDS

- A. CSP ensures that mechanisms are in place for the prevention, detection and reporting of fraud, waste, and/or program abuse. All employees are familiar with the types of fraud, waste, and/or program abuse that could occur during their normal day to day activities.
- B. Personnel at all sites are trained at orientation on corporate compliance standards and procedures and are informed that any person who knowingly obtains any benefit by means of false or fraudulent pretenses, representations, promises or material omissions is guilty of a Class 2 Felony.
- C. Corporate compliance tip boxes are maintained at all sites.
- D. CSP follows ADHS reporting requirements for incidents of fraud, waste and program abuse.
- E. CSP maintains a system of no-reprisal for any good faith reports of suspected fraud, waste, or program abuse.



#### IV. PROCEDURES

- A. Reporting of fraud, waste, and program abuse involving Title XIX/XXI funds or AHCCCS registered providers and recipients.

Upon becoming aware of a suspected incident of fraud, waste and/or program abuse, including a suspected incident committed by the T/RBHA, a T/RBHA or provider has 10 working days to inform the AHCCCS/OIG of the suspected fraud, waste, or program abuse in writing to the address below or by submitting an online form accessible at the link below.

AHCCCS Office of Inspector General  
701 E. Jefferson Street, Mail Drop 4500  
Phoenix, Arizona 85034  
<http://www.azahcccs.gov/fraud/reporting/reporting.aspx>

Phone: (602) 417-4193 or (602) 417-4045  
Fax: (602) 417-4102

In addition, T/RBHAs or providers should advise the ADHS/DBHS/BCC of the report to AHCCCS by calling or writing to the contact information below.

##### ADHS/DBHS

Bureau of Corporate Compliance  
150 N. 18<sup>th</sup> St., suite 270  
Phoenix, Arizona 85007  
(602) 364-3758 or 1-866-569-4927  
Fax number: (602) 542-3940  
Email: [reportfraud@azdhs.gov](mailto:reportfraud@azdhs.gov)

- B. Reporting of fraud, waste and program abuse involving Non-Title XIX/XXI funds and/or grants.

Upon becoming aware of a suspected incident of fraud, waste, and /or program abuse, including a suspected incident committed by the T/RBHA, a T/RBHA or provider has ten (10) working days to inform ADHS/DBHS/BCC by completing [PM Form 7.1.1, Suspected Fraud or Abuse Report](#) and faxing mailing or emailing it to ADHS/DBHS. Reports of fraud or abuse may also be taken over the phone at (602) 364-3758 or 1-866-569-4927.



C. Reporting of fraud, waste, and program abuse to the T/RBHA

In addition to notifying ADHS or AHCCCS, health providers may need to notify their contracted T/RBHA of all suspected incidents of fraud, waste, or program abuse. Call or write to the CSP Corporate Compliance Officer at:

CSP Director  
7490 S. Camino de Oeste  
Tucson, AZ 85746  
(520) 879-6060 Fax (520) 879-6099