

2024



Program Integrity Auditing and  
Reporting Capabilities, Experience,  
and Senior Consulting Team



## EXECUTIVE SUMMARY

Crestline Advisors, a Health Management Associates (HMA) company, is pleased to present a brief description of our Program Integrity auditing and reporting capabilities, which we offer through our experienced and qualified bench of Senior Advisors.

Our team includes experts who are knowledgeable in the documentation requirements for a broad range of behavioral health (BH) services covered by Medicaid managed care organizations (MCOs). This includes, but is not limited to case management, community-based interventions, individual and group counseling, medication management, mobile crisis and community stabilization, mental health skills building, alcohol and drug abuse treatment, inpatient psychiatric hospitals, Applied Behavior Analysis (ABA), and Assertive Community Treatment.

**Our team can assist MCOs to develop and operate their BH fraud, waste, and abuse (FWA) auditing programs, including the Special Investigations Unit (SIU) by:**

- Creating and/or updating provider communications, such as the medical record request letter.
- Developing and/or customizing audit tools (a sample can be provided upon request).
- Creating and/or tailoring audit finding reports for providers and specific services (e.g., ABA).
- Conducting pre-pay and post-pay medical record reviews to identify FWA across a comprehensive range of error categories (e.g., inadequate documentation, note requirement errors, unqualified providers, incorrect units, unbundling, and double billing).
- Supporting MCOs in communications with providers and the State, including in State Fair Hearings.
- Providing Program Integrity training to clients, as needed.

**Crestline clients who use our Program Integrity audit services benefit from a return on investment of over 14:1 through recoupment of identified overpayments and loss prevention.**

## COMPANY BACKGROUND

Crestline has provided compliance auditing services for MCOs and specialty health plans since 2014, including data validation and FWA auditing to support the SIU. In April 2023, Crestline joined the HMA family of companies. HMA is an independent, national research and consulting firm specializing in publicly funded healthcare and human services policy, programs, financing, and evaluation. HMA serves the government, public and private providers, health systems, health plans, community-based organizations, institutional investors, foundations, and associations. With offices in more than 30 locations across the country and over 700 multidisciplinary consultants coast to coast, HMA's expertise, services, and team are always within client reach.

## PROGRAM INTEGRITY AUDITING DEVELOPMENT EXPERTISE

Crestline's Senior Advisors leverage their relevant operational and clinical subject-matter expertise and our well-established FWA auditing processes to conduct meticulous reviews. The combination of these elements set us apart from other program integrity consulting firms. Unlike other consulting firms, Crestline does not recruit its consultants using LinkedIn or similar sites; instead, we work with a carefully vetted, core group of veteran colleagues.

Our program integrity auditing team members have supported the SIUs of three Medicaid health plans in different states, to-date. Since 2015, we have conducted well over 1000 FWA audits, comprising over 100,000 claim lines. For example, since 2021 our audit findings led one Medicaid plan to identify more than \$11 million dollars in recoupments and prevented costs for overbilling.

## OUR APPROACH TO PROGRAM INTEGRITY AUDITING

Crestline understands the importance of a robust Program Integrity audit/review program which supports MCOs' adherence to Medicaid contractual requirements, State and federal requirements, and National Committee for Quality Assurance (NCQA) standards. We also help clients track inadequate billing practices, identify emerging trends, and verify members received services billed by providers through periodic audits. We complete a comprehensive review of member records to review FWA allegations, and report findings to the MCO.

### Our Program Integrity Auditing services include:

- **An assigned Project Manager (PM) and Single Point of Contact (SPOC) for the project**
- **Detailed and accurate tracking grids of assigned cases in our Provider Review Tracking Tool, which captures the status and key dates of review activities, assigned Crestline reviewer(s), date the review was completed, and the date of the written findings report**
- **Provision of approved, experienced BH consultants to conduct program integrity medical record reviews, re-reviews, and pre-payment reviews. Consultants may be licensed clinicians, certified coders, and other compliance experts (e.g., former chief compliance officers, etc.)**
- **When required by the client, Crestline Advisors schedules a brief Opening Conference with the provider including an:**
  - + Overview of the provider review purpose and process
- **Conducting the provider audit, upon receipt of the provider records, and completing the applicable Review Tool, which will capture the standards to be assessed pursuant to the client's requirements. The review process will include the following:**
  - + Review of relevant information supplied by the provider
  - + Review of applicable provider manuals, state Medicaid agency manuals, provider notices, or other relevant documents provided by the client
  - + Scoring/calculation of the audit findings, such as identification of error rates within the sample of records reviewed
  - + Drafting of a written report summarizing the audit findings and description of manuals, rules, or guidance utilized in conducting the review
- **Collaborating and meeting with the client's assigned Project Manager or other stakeholders upon request**
  - + Conducting re-reviews based on receipt of additional information, etc.
  - + Detailed record-keeping of hours for services rendered

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Crestline generally completes reviews of less than 1,000 claim lines within three weeks of receipt of the provider records, or within 5 weeks of receipt of records for reviews of more than 1,000 claim lines. These are general timelines, and review completion times may vary based on a variety of factors, including but not limited to complexity and scope of the review, volume and organization of records submitted by the provider, volume of reviews being conducted during the same time, and delays outside the control of Crestline such as delayed or incomplete submission of records by providers.

To safeguard our clients, we collect a Reviewer Conflict of Interest Statement from each auditor assigned to the project (refer to **Attachment A**).

See **Attachment B** for a sample Special Investigations Unit Review Report. As mentioned, our reports can be customized to meet clients' needs and requirements.



## Crestline's Senior Team of BH Auditing Consultants

Our experienced and qualified team of auditors include the following individuals

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**Beth Pfile, L.C.S.W.**  
FWA Project Lead

Beth Pfile, LCSW brings more than 35 years of experience in the social services, behavioral health, and healthcare industries, including more than 20 years in leadership. Beth has extensive experience working in psychiatric residential facilities, child welfare, community mental health, and managed care organizations. She has led large teams to include budget oversight, clinical oversight, and operations.

As a clinical director, Beth has developed successful programming for children and adolescents and has led direct service providers and clinicians. She led a utilization management and care management team for an MCO and successfully developed processes, policies, and procedures, and worked directly with provider organizations to improve their services for Medicaid members. Beth has experience writing RFP responses for child welfare contracts and Medicaid health plans.

Beth joined Crestline in September 2022 and leads our fraud, waste, and abuse provider auditing projects for Crestline's clients in addition to supporting Medicaid RFP response development.

She earned a Bachelor's of Social Work degree at Iowa State University and a Master's of Social Work degree at Arizona State University and is dedicated to serving oppressed populations.



**Jennifer Brummet, L.P.C.**

Jennifer Brummet, L.P.C., is an adaptable professional with over 18 years of experience working in various behavioral healthcare and child welfare settings across the country. As a Licensed Professional Counselor in Arizona, Jennifer is an approved clinical supervisor under the Arizona Board of Behavioral Health Examiners. Clinically trained in the treatment of Eating Disorders, Trauma, EMDR, Substance Abuse, Dialectical Behavioral Therapy, and Cognitive Behavioral Therapy, Jennifer's experience working in both public and private sectors enables her to assist organizations in acquiring accreditation, credentialing, and licensing. Jennifer's expertise extends to conducting data validation, quality assurance, and utilization management auditing of providers and MCOs.

Jennifer joined Crestline Advisors in 2015. Since that time, she has worked with an array of healthcare entities. These include integrated health care, BH, mental health organizations, state agencies, and MCOs. Her consulting focus includes leading project management teams for the implementation of statewide foster care organizations, request for proposal response development for specialty health services, offering clinical practice and quality improvement techniques, conducting organizational assessments, giving technical assistance around clinical programming and process flows, steering contract negotiations, and supporting service capacity building.

She received her Bachelor of Arts in psychology from Arizona State University and her master's in counseling from the University of Phoenix. She also holds a certificate in Non-profit Leadership. An avid student of yoga and a certified children's yoga instructor, she helps other yoga teachers understand and work with children with special needs.





**Jennifer Foote, L.P.C.**

Jennifer Foote is an L.P.C. with an eclectic array of professional experience. Her clinical experience includes variety of settings including private practice, courtordered treatment, and Medicaid systems of care. She has worked with children in foster care and adults with serious mental illness with specialties in trauma modalities and Dialectical Behavior Therapy (DBT).

Jennifer served in leadership as a clinical supervisor and workforce development for a large Medicaid organization in Arizona and developed training programs with quality management and technology advancement to meet managed care audit requirements while promoting best practice conceptualization and documentation. Participating in statewide peer support workgroups, she redesigned the Peer and Recovery Support Specialist training to meet higher standards of practice and accountability for the position. She actively participated in the implementation of the new 988 contracts and the development of state and nationwide training for call center and emergency response integration with mobile teams.

Jennifer joined Crestline in 2022 as part of the FWA team. She also participates in RFP response writing and prewriting activities with specialization in behavioral health clinical practices and case management.

She received her Bachelor of Arts in Psychology from Arizona State University and her Master of Science in Clinical Mental Health Counseling from Walden State University. She has been in the Phoenix area since 2003.



**Cayla Gensler, L.P.C.**

Cayla Gensler is an accomplished independently licensed professional counselor with over 13 years of experience in the healthcare industry. Cayla has worked in a variety of settings including residential, inpatient, outpatient, and with the BH adult systems of care for the regional behavioral health authority of Arizona. Her experience includes administrative, management, and clinical roles. The variation in her previous roles provides Cayla with the capacity to understand and differentiate the requirements of various positions within the Medicaid system.

Cayla joined Crestline in December 2022 with a primary focus in auditing, compliance, and FWA prevention and detection.

She received her Bachelor of Arts in psychology from Arizona State University and her Master of Arts in counseling from University of Phoenix. She holds her independent license in counseling from the Arizona Board of Behavioral Health Examiners. In addition to her work at Crestline, Cayla continues her clinical work as a therapist and Director of Outpatient services in Phoenix, Arizona.



**Jessie Gillam, M.C., L.P.C., N.C.C.**

Jessie Gillam is a seasoned clinical executive with over 20 years of experience working in the healthcare industry, including over 10 years in VP or Chief level positions. Jessie has clinical and operational leadership experience with behavioral health, child welfare, residential, and early intervention organizations. She has led multidisciplinary teams through program and market expansion and clinical enhancements, while ensuring continuous quality improvement.

Jessie joined Crestline Advisors in July 2022. Since that time, she has focused on BH fraud, waste, and abuse auditing and RFP response writing.

She received her Bachelor of Science in Psychology from Arizona State University and her Master of Community Counseling from the University of Phoenix. She became licensed as a certified counselor with the National Board for Certified Counselors in April 2005 and a professional counselor with the Board of Arizona Health Examiners in October 2007. She is certified to provide clinical supervision to Arizona-based counselors and social workers seeking independent licensure.



**Michele Grignon, M.C., L.P.C.**

Michele C. Grignon, MC LPC, is a seasoned health care management expert who has over 25 years of experience in managed care consulting, health care accreditation, clinical operations, and call center environments. Michele has served in management and executive roles for national managed care companies and provider organizations, overseeing utilization management functions, training programs, and BH and nursing crisis intervention services.

Michele joined Crestline Advisors in October 2016 with a primary focus on completing utilization review and data validation projects, RFP response writing, and managed care operations projects.

She received her Bachelor of Arts in Psychology and Sociology from the University of Wisconsin, Madison, and her Master of Community Counseling from the University of Phoenix. She became licensed as a professional counselor with the Arizona Board of Behavioral Health Examiners in July 2004. She is a Certified Clinical Trauma Specialist for Individuals through the Arizona Trauma Institute.



**Elizabeth Harken, J.D.**

Elizabeth Harken, J.D., is a seasoned compliance executive with experience in a broad array of health care programs throughout the United States. Elizabeth served as the chief compliance officer for a national managed BH organization. During that time, she oversaw compliance with 15 state Medicaid programs, as well as Medicare Advantage, Employee Retirement Income Security Act (ERISA), state insurance requirements, federal contracts, and Employee Assistance Programs. She has developed and managed: the FWA prevention and detection program; privacy program, including implementation of Health Information Technology for Economic and Clinical Health (HITECH) amendments; compliance training and education; and internal audit and ethics hotline. In addition to her compliance experience, Elizabeth served as the director of grievance and appeals. She was responsible for developing and operationalizing policies, workflows, and staff training materials consistent with state and federal requirements.

Elizabeth joined Crestline Advisors in January 2015, with a primary focus on compliance programs, FWA prevention, and detection, and operationalizing health care regulations, accreditation standards, and licensing requirements. She also provides proposal response development services, primarily focusing on legal and regulatory functions.

She received her Bachelor of Arts in Psychology from Cornell College and her Juris Doctorate from the University of Iowa. She is a member of the State Bar of Arizona.



**Roni Hooper, LMSW**

Roni Hooper is a highly skilled executive with over 25 years of Medicaid/Medicare experience in the healthcare industry. Throughout her career, Roni has held important positions in MCOs and has been involved in critical departments such as the BH adult system of care and clinical operations. Her executive-level oversight of large provider programs has resulted in obtaining contracts based on RFP responses, the development of strategic plans, policies, procedures, workflows, root cause analysis/interventions, and supervision protocols. Roni's unwavering dedication has improved employee satisfaction, efficient operational programming, integrated BH and primary care, and successful management of yearly budgets.

Roni joined Crestline Advisors in May of 2022 to aid health plan and provider clients. She offers a wide range of services including Program Integrity auditing, reporting, and project management, strategic planning, managing clinical operations, improving processes, creating policies and workflows, and implementing new programs.

She obtained a Bachelor of Arts in Social Work from Dana College in Nebraska and a Master of Social Work degree from Arizona State University. She received her Associate License in Social Work with the Board of Washington Health Examiners in 2023. She has been living in the Seattle area since 2018 after spending 17 years in the Phoenix metropolitan area.



**Danise Leveille, M.C., L.P.C.**

Danise Leveille, M.C., L.P.C., is a seasoned healthcare professional with more than 25 years of experience. She has worked in both provider organizations and MCOs and held leadership positions within crisis departments, outpatient clinics, network operations departments, project management, and program development.

Danise has overseen the management and director-level responsibilities for state-wide departments to include both rural and urban populations. Her contributions include policy and contract development, expansion of community-based services, implementation of state-wide peer support certification programs, and integration of crisis call centers. As a result, community services and provider performance have improved.

Danise joined Crestline Advisors in 2022. Since that time, she has assisted Crestline's health plan, and provider clients with Medicaid managed care RFP response writing, process improvement, policy and workflow creation, implementation of new programs, and strategic planning.

She received her Bachelor of Arts in English degree from Arizona State University and her Master of Counseling degrees from University of Phoenix. She is a Licensed Professional Counselor in Arizona.



**Armando Peelman, Ed.D., M.S.C., L.A.C.**

Armando Peelman, EdD, MSC, has more than 20 years of experience in BH and managed care. He has worked in both provider and health plan organizations as an administrator, director, trainer, and clinician. As the plan administrator he was responsible for the clinical, contractual, and operational oversight of all contracted Medication Assisted Treatment, outpatient, intensive outpatient, substance use residential, eating disorders, and integrated care providers.

Armando also serves as a subject matter expert on Human Development, Mental Health and Wellness, and Trauma Informed Care for a local university.

Armando has participated in numerous RFP and RFA bid proposals. His areas of writing experience include case management, evidence-based services, assessment and screening, community-based organizations, value added services, child welfare, case scenarios, and adult and children's BH.

He obtained a Master of Counseling degree from University of Phoenix and a Doctor of Education with emphasis on Behavioral Health from Grand Canyon University. He is a Licensed Associate Counselor in Arizona and has lived in the Phoenix metropolitan area since 2003.





**Laurie Prudence, M.S., C.P.H.Q.**

Laurie has over 30 years of experience in healthcare. She has worked as a clinician and in administration, and co-founded a successful, national telepsychiatry company. She has extensive experience in quality management, regulatory compliance, and program operations.

Laurie has worked in various settings including provider agencies, a university, a health plan, and the Superior Court. Laurie first worked with Crestline in 2013 where she assisted with RFP response development and program implementation. Since 2022, she has concentrated on compliance auditing.

She earned her Bachelor of Arts in Psychology and her Master of Science in Rehabilitation Psychology from the University of Wisconsin, Madison. She is a Certified Professional in Healthcare Quality.



**Shannon Walters, M.C., L.A.C.**  
Associate Managing Director

Shannon Walters, M.C., L.A.C., is a versatile professional with more than 30 years of experience in the health care industry. She became a consultant with Crestline Advisors in 2015 and is now the Associate Managing Director for the company. Over the years, she has supported RFP response development for numerous Medicaid MCOs and procurements, building strong relationships with health plan clients along the way. She excels in writing for care management, BH, clinical scenarios, network, and provider relations content areas for varied population types. She previously managed and still serves as an auditor on our Program Integrity Audit team. She also supports oversight of our Network Management project to help health plan clients meet provider contracting goals during implementation or expansion.

Prior to her work with Crestline Advisors, Shannon worked in both provider and Medicaid MCO settings, holding leadership positions in BH/crisis call centers and utilization management, provider relations, and network operations departments. She has been responsible for the management and oversight of large multi-team departments. With a focus on customer service and employee morale, she developed policies, procedures, workflow improvements, and effective employee training and supervision protocols. These efforts lead to increased employee satisfaction and performance and improved relationships with providers.

She received her Bachelor of Arts in Psychology and Master of Counseling degrees from Arizona State University and is a Licensed Associate Counselor in Arizona. She recently moved to the Los Angeles area, after living in the Phoenix area for more than 30 years.



**Christine Wells, Ph.D., M.B.A.**

Christine Wells is a clinical psychologist with over 25 years' experience in the health care sector. She has held executive leadership positions in clinical and operational management in community-based provider organizations and a managed care organization.

In her role as a regional executive director with a managed BH organization, she had responsibility for the management of comprehensive mental health services for a commercial health plan, including member services, provider network, claims management, and utilization review. As a non-profit executive, Christine was the lead for a team that developed the first facility licensed in Arizona to offer integrated primary and BH care and wellness services exclusively to individuals living with serious mental illness. Christine has served as interim executive director for the National Alliance on Mental Illness Southern Arizona.

Since joining Crestline Advisors in 2017, Christine has assisted Crestline's health plan and provider clients with RFI/proposal response writing, implementation of integrated care processes and policies, facility licensing, process improvement, delivery system transformation, and strategic planning. Her writing expertise includes mental health and substance use, care management, and integrated care.

She earned a Bachelor of Arts degree in Psychology and Sociology from Mount Holyoke College. She earned a Ph.D. in Clinical Psychology from Clark University along with a Masters in Business Administration from the University of Vermont. She is currently a licensed psychologist in Arizona and has lived in Tucson since 2006.



## Attachments

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## Attachment A

### Reviewer Conflict of Interest Attestation

Crestline Advisors, an HMA Company (Crestline/HMA) conducts provider reviews on behalf of [CLIENT] (including but not limited to various [CLIENT] Medicaid managed care organizations). To maintain the integrity of monitoring activities and findings, contractors must avoid any actual or perceived conflicts of interest. Conflicts of interest, in this context, include situations where a reviewer's independent judgement may be called into question. Examples include situations where the reviewer:

- May gain a personal financial benefit (beyond the Crestline/HMA contracted rate for performing the review activities;
- Has knowledge of confidential or private information related to the provider that was obtained because of prior or current work performed for or on behalf of the provider (ex. provider is a past employer, reviewer has done internal auditing, organizational assessments, or provided advice as a consultant/contractor to the provider);
- Is, or has been, an employee or member of the board of directors for a provider organization; or
- Has a familial relationship (ex. spouse, child, stepchild, parent, sibling, in-laws) with the provider or provider agency employee or board member.

A conflict of interest does not arise in situations where the reviewer has conducted prior reviews or audits of a provider or provider agency on behalf of the same, or a different, oversight agency or funding source (ex. the same auditor could conduct a program integrity audit, SIU audit and perform utilization reviews of the same provider, so long as all three activities were done on behalf of [CLIENT], or another managed care organization or health plan).

If reviewers have any questions or concerns regarding a potential or actual conflict of interest, they should promptly contact either Timothy Mechlinski or Shannon Walters, so that appropriate steps can be taken to assess and address the potential conflict.

*I have reviewed the above Conflict of Interest Statement, and by signing below, attest that I understand and agree to notify Crestline/HMA of any actual or potential conflicts of interest prior to accepting any audits or reviews of providers that may present a conflict of interest. I understand that if I have questions regarding whether a conflict exists, I should notify either Susan Dess or the project lead.*

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Consultant Signature

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Consultant Name

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Date



## Attachment B

### Special Investigations Unit Review Report

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To: Investigator name, Investigator, Special Investigations Unit

From: <<Reviewer Name and credentials>>, Crestline Advisors

Date: ENTER DATE

Subject: SIU Review – <<Provider Name>>

### SUMMARY OF FINDINGS

Crestline Advisors, on behalf of <<CLIENT>>, completed a Special Investigations Unit (SIU) review of <<Provider Name>> during <<MONTH(S) and YEAR>> to assess compliance applicable requirements, including the <<State Agency>> Provider Manuals. The investigation reviewed # claim lines and resulted in the identification of non-compliance with documentation and billing requirements that may have resulted in inaccurate/inappropriate payments in # (#%) claim lines.

The review was conducted because “<<add language from referral>>.”

Crestline’s review included <<#>> members who received services between <<DATE>> and <<DATE>>. The claim lines reviewed were for <<service name and code (# of claim lines)>> and <<service name and code (# of claim lines)>>.

With regard to the original allegation, <<insert a high-level description summarizing findings that directly relate to allegations, or if allegations can’t be verified based on record review/Crestline’s scope, say it here>>. In our review of <<PROVIDER NAME>> claims and associated documentation we identified the following errors (note: individual claim lines may be scored with more than one of the error types discussed below):

<<Insert list of potential FWA error types and percentages found>>

### ADDITIONAL COMMENTS

Additional concerns regarding the quality of documentation and services that were identified, but did not present a significant risk of inaccurate billing/payment, included:

<<Insert list of additional comments to share with provider to assist them to improve the quality of their documentation>>

### REFERENCES

We consulted the following resources to assist in completion of this review:

- <<State Agency>> Provider Manual
- <<Client Name>> Provider Manual

Confidential

# Contact us

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