

## POLICIES AND PROCEDURE MANUAL

<b>Chapter:</b>	Provider Network Management		
<b>Title:</b>	Provider Network Credentialing/Recredentialing		
<b>Policy:</b> <input checked="" type="checkbox"/>	<b>Review Cycle:</b> Biennial	<b>Adopted Date:</b> 04.07.2015	<b>Related Policies:</b> Provider Network Management Service Provider Reciprocity Personnel Manual
<b>Procedure:</b> <input type="checkbox"/>	<b>Author:</b> Provider Network Mgmt. Committee, Chief Executive Officer	<b>Review Date:</b> 03.01.2022	
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### **Purpose**

In accordance with statutory and funding requirements, Mid-State Health Network (MSHN) is responsible to assure that providers (practitioners and organizations) within the region are appropriately qualified and competent to provide covered and authorized services. All professionals who provide clinical services within the MSHN network must be properly credentialed and recredentialed.

### **Policy**

MSHN seeks to ensure the competency and qualifications of the service delivery network in the provision of specialty services and supports covered services and programs. To achieve that goal, it is the policy of MSHN that specific credentialing and recredentialing activities shall occur and be documented to ensure that staff, regional network providers, and their subcontractors are operating within assigned roles and scope of authority in service delivery or business functions. MSHN shall adopt procedures that assure credentialing and recredentialing practices require providers and sub-contractors obtain and maintain proper credentials for their job position and responsibilities as required by statute, policies, and/or job description qualifications.

The policy, and related procedures, applies to Community Mental Health Service Participants (CMHSPs) and their network of providers and Substance Use Disorder Service Providers (SUDSPs) contracted directly with MSHN.

### **Licensed Independent Practitioners**

All credentialing/recredentialing practices shall be conducted in accordance with the MDHHS Credentialing and Recredentialing Process and MSHN *Credentialing Licensed Independent Practitioners procedure*, and at a minimum, require:

- Initial credentialing upon hire or contracting,
- Re-credentialing at least every two years, and
- A process for ongoing monitoring and primary source verification of expired licenses, certifications, and other credentials.

Credentialing and recredentialing processes shall not discriminate against: (a) a health care professional solely on the basis of license, registration, or certification; or (b) a health care professional who serves high-risk populations or who specializes in the treatment of conditions that require costly treatment.

Credentialing and recredentialing processes must ensure that network providers residing and providing services in bordering states meet all applicable licensing and certification requirements within their state.

### **Organizational Providers**

For organizational providers included in its network, and in accordance with the *Credentialing Organizational Providers procedure*, MSHN and CMHSPs must:

- validate, and re-validate at least every two years, that the organizational provider is licensed or certified as necessary to operate in the State, and has not been excluded from Medicaid or Medicare participation.
- ensure that the contract with any organizational provider requires the organizational provider to credential and re-credential their directly employed and subcontract direct service providers in accordance with the MSHN credentialing/re-credentialing policies and procedures (which must conform to MDHHS's credentialing process).

### **Monitoring and Oversight of Credentialing and Recredentialing Activities**

MSHN provider network credentialing and recredentialing process is delegated to the CMHSP Participants and Substance Use Disorder Service Providers (SUDSP) under contract with MSHN. Delegation includes compliance with the credentialing and recredentialing policies and procedures, conducting specific credentialing and recredentialing activities for applicable health care providers, and establishing and maintaining credentialing records.

All CMHSPs and SUDSPs under contract with MSHN providing Medicaid, Healthy Michigan, and Substance Use Disorder Community Grant Services shall have policies and procedures for credentialing and recredentialing that are updated as needed (not less than biennially), to meet MDHHS credentialing guidelines, MSHN policy, and any other pertinent regulatory requirements.

The CMHSPs and SUDSPs shall identify a designee with responsibility for the administration and oversight of credentialing and recredentialing activities. The designee shall assure that credentialing and recredentialing decisions are made by the agency's medical director, qualified practitioner, or credentialing committee. The designee shall maintain credentialing and recredentialing source documents of organizational providers and/or licensed independent practitioners who are employed or contracted to provide health care services. Credentialing and recredentialing records are subject to MSHN, state, and Federal audit.

MSHN is responsible for the oversight of any delegated credentialing or recredentialing decisions within its service delivery network and shall review these practices in accordance with the MSHN delegated functions monitoring and oversight policy, procedure, and protocols. Compliance shall be assessed based on MSHN policies and standards in effect at the time of the credentialing or recredentialing decision.

MSHN retains the right to approve the credentialing decisions of a CMHSP or SUDSP or require discontinuation of service by organization providers and/or licensed independent practitioners without the proper credentialing status. Improper or insufficient credentialing practices by CMHSP or SUDSP may be cause for contractual sanction(s) by MSHN, requiring a corrective action plan, and could be cause for contract suspension or termination. In accordance with the Medicaid Event Verification Policy and Procedure, MSHN may recoup funds for any fee-for-service provider for any claims/encounters that are found to be invalid as a result of improper credentialing.

Administration of credentialing/recredentialing activities and oversight is the responsibility of the MSHN Director of Provider Network Management Systems, under the direction of the Provider Credentialing Committee (PCC). The PCC charter details the membership and roles/responsibilities for credentialing activities.

### **Deemed Status**

Organizational Providers or Licensed Independent Practitioners may deliver healthcare services to more than one agency. MSHN, CMHSPs, or SUDSPs may recognize and accept credentialing activities conducted by any other agency in lieu of completing their own credentialing activities. In those instances where a MSHN, CMHSPs, or SUDSPs choose to accept the credentialing decision of another agency, they must maintain copies of the credentialing documents including Primary Source Verification (PSV) and the credentialing decision in their administrative records.

### **Notification Requirements and Appeal of Adverse Credentialing Decision:**

Organizational Providers and Licensed Independent Practitioners shall be notified, in writing, of all credentialing decisions, including credentialing status, effective date, and recredentialing due date. An organizational provider or licensed independent practitioner that is denied credentialing or recredentialing shall be informed of the reasons for the adverse credentialing decision in writing and shall have an appeal process that is available when credentialing or recredentialing is denied, suspended or terminated for any reason other than lack of need. In instances of a conflict of interest, subcontracted providers responsible for credentialing and recredentialing LIPs may utilize the MSHN provider appeal process to ensure a neutral and fair appeal process is available.

If the reason for denial, suspension, or termination is egregious (serious threat to health safety of consumers or staff, represents a substantiated criminal activity, etc.) action shall be taken immediately. In the event of immediate suspension or termination MSHN, CMHSPs, and SUDSPs shall address coordination of care so as to prevent disruption of services.

### **Record Retention**

All credentialing and recredentialing documentation must be retained for each credentialed provider and include:

- Initial credentialing and all subsequent recredentialing applications;
- Information gained through primary source verification; and
- Any other pertinent information used in determining whether or not the provider met credentialing and recredentialing standards

Records shall be retained in accordance with MSHN Record Retention Policy.

### **Reporting Requirements**

CMHSP Participants and SUDSPs are responsible to report suspected fraud, abuse, and licensing violations to MSHN as soon as it is suspected. If a matter expected to lead to suspension or revocation, is known to be related to fraud, abuse, and/or a licensing violation, reporting shall be conducted in coordination with the MSHN Chief Compliance & Quality Officer and any regulatory/investigative agency involved. MSHN and the responsible CMHSP or SUDSP shall coordinate immediate verbal (phone) reporting to the Office of the Inspector General (OIG), Licensing and Regulatory Affairs (LARA) and the Division of Program Development, Consultation and Contracts, Behavioral Health and Developmental Disabilities Administration in MDHHS accordingly. Verbal notice shall be followed by written notice of the matter including any relevant supporting documentation. Information shall be submitted via e-mail in an encrypted format and by regular mail if requested. Once a matter has been turned over to the OIG further investigation should be suspended unless approval is granted by the OIG.

The Chief Compliance & Quality Officer shall maintain records of all credentialing activities reported to MDHHS or the OIG in accordance with MSHN compliance monitoring policies and procedures.

Additionally, MSHN and its provider network shall maintain written procedures to address:

- Standards and responsible parties for credentialing functions;
- Initial credentialing and recredentialing (including primary source verification and evidence that minimum training requirements are met);
- Temporary and provisional credentialing;
- Suspension and revocation;
- Use of Quality Assessment and Performance Improvement Program information and findings as part of the recredentialing process;
- Background checks;
- Monitoring of credentialing/recredentialing practices including the practices of organizational providers.

**Applies to:**

- All Mid-State Health Network Staff
- Selected MSHN Staff, as follows:
- MSHN’s CMHSP Participants Policy Only  Policy and Procedure
- Other: Sub-contract Providers

**Definitions:**

Credentialing: Confirmation system of the qualification of healthcare providers.

CMHSP: Community Mental Health Services Program

Licensed Independent Practitioner: an individual, as permitted by law and regulation, and also by the organization, to provide care and services without direction or supervision within the scope of the individual’s license and consistent with the privileges granted by the organization.

MDHHS: Michigan Department of Health & Human Services

MSHN: Mid-State Health Network: Prepaid Inpatient Health Plan under contract with the MDHHS to provide managed behavioral health services to eligible individuals.

Organizational Providers: Entities that directly employ and/or contract with independent contractors to provide behavioral health/health care services. Examples of organizational providers include but are not limited to: Community Mental Health Services Programs; hospitals; nursing homes; homes for the aged; psychiatric hospitals, units and partial hospitalization programs; substance abuse programs; and home health agencies.

Recredentialing: Process of updating and re-verifying credential information

SUDSP: Substance Use Disorder Service Provider (Treatment, Prevention, and Recovery)

**References/Legal Authority:**

MSHN Personnel Manual: Credentialing and Recredentialing

MDHHS Contract: Credentialing & Re-credentialing Processes; Provider Credentialing; SUD Policy Manual - Credentialing and Staff Qualification Requirements

MDHHS Medicaid Provider Manual

42 CFR 438.214

42 CFR 438.12

**Attachments:**

**Change Log:**

<b>Date of Change</b>	<b>Description of Change</b>	<b>Responsible Party</b>
03.2015	New policy	PNMC
07.2015	Address compliance requirements with MDHHS Contract attachment– P7.1.1 in accordance with MSHN’s	Director of Provider Network Mgmt.
09.2016	Annual Review; Registered Dietitian added to list of professionals requiring credentialing	Director of Provider Network Mgmt.
09.2018	Annual Review	Director of Provider Network Mgmt.
08.2017	Annual Review; update responsible staff title	Director of Provider Network Mgmt.
09.2019	Annual Review – revisions, moved ‘A Word About Professional Licensure’ to LIP Procedure	Director of Provider Network Management Systems
11.2021	Biennial Review – Changed titles as necessary; Removed attachment references to MDHHS contract	Contract Manager