

POLICIES AND PROCEDURE MANUAL

Chapter:	Provider Network Management		
Title:	SUD Credentialing and Qualifications		
Policy: <input type="checkbox"/> Procedure: <input checked="" type="checkbox"/> Page: 1 of 5	Review Cycle: Biennial Author: Compliance Administrator	Adopted Date: 09.12.2023 Review Date: 03.05.2024	Related Policies: Provider Network Management Provider Network Credentialing/Re-credentialing Compliance Disqualified Providers

Purpose

The purpose of this operating procedure is to detail the process for credentialing and recredentialing activities of Substance Use Disorder (SUD) Treatment and Prevention provider staff to ensure compliance with the Michigan Department of Health & Human Services (MDHHS) SUD Credentialing and Staff Qualifications.

Initial Credentialing

At a minimum, policies and procedures for the initial credentialing of the individual practitioners must require:

1. A written application that is completed, signed and dated by the provider and attests to the following elements:
 - a. Lack of present illegal drug use.
 - b. Any history of loss of license and/or felony convictions.
 - c. Any history of loss or limitation of privileges or disciplinary action.
 - d. The correctness and completeness of the application.
2. Verification from primary sources of items listed in the Primary Source section above, as applicable to the individual practitioner applying for credentialing.

Primary Source Verification (PSV)

Individual practitioner credentials must be verified by primary source, prior to any consumer contact.

Valid credentials are a condition of employment/contract and ongoing participation in the provider network. As applicable, the following require PSV – refer to Attachment A Primary Source Verification:

- State Licensure, certification, or registration;
- Board Certification;
- Drug Enforcement Agency (DEA)/Controlled Dangerous Substances (CDS) (required for practitioners writing prescriptions);
- Required training and certifications (i.e., MDHHS Peer Recovery Coach, Connecticut Community for Addiction Recovery (CCAR), Specialty training specific to role/services provided, etc.)
- Background checks (refer to Background Check procedure) including criminal history, central registry, and Medicare/Medicaid Sanctions.;

Note: If the individual practitioner undergoing credentialing is a physician, then physician profile information obtained from the American Medical Association (AMA) or American Osteopathic Association (AOA) may be used to satisfy state licensure and Board Certification.

Subsequent verification(s), as applicable, must be conducted, documented, dated, and verified upon expiration/renewal of credential.

Ongoing Verification

Substance Use Disorder Service Providers (SUDSPs) are responsible for ensuring ongoing verification to ensure providers licensure and/or certification does not lapse.

SUDSPs are responsible for ongoing background checks as outlined in the MSHN Background Check Procedure.

Suspension and Revocation

Circumstances that automatically result in suspension or revocation :

- *Lack of current licensure* – The practitioner does not possess a current, valid license to practice in Michigan or the bordering state in which they reside and provide services, including because a previously valid license has expired, lapsed, or has been suspended or revoked, or otherwise ceases to meet the qualification.
- *Lack of DEA/CDS registration* - The practitioner does not possess a current, valid registration with the DEA/CDS, including because a previously valid registration has lapsed, expired, or been suspended or revoked or otherwise ceases to meet the qualification. This criterion applies only to a practitioner's who prescribe controlled substances.
- *No malpractice insurance* - The practitioner does not currently have professional liability insurance in the amounts required by the agency policy or otherwise ceases to meet the qualification. This criterion applies only to a Practitioner's required to carry professional liability insurance and is not covered under the agency policy.
- *Exclusion from government programs* - The practitioner is excluded from or limited in participation in a federal or state health care program.
- *Criminal charges* - The practitioner is convicted (including a pleas of guilty or no contest) of an exclusionary crime as outlined in the Disqualified Individuals Policy.

Credentialing suspension/revocation decisions will not include any information regarding an applicant's status related to allegations or pending investigations in process associated with licensure or registration; MSHN and SUDSPs support due process for all independent applicants in matters pertaining to unsubstantiated allegations of misconduct.

Applies to:

All MSHN Staff

Selected MSHN Staff, as follows:

MSHN CMHSP Participants: Policy Only Policy and Procedure

Other: subcontracted providers (SUDSP)

Definitions:

AMA: American Medical Association

AOA: American Osteopathic Association

CCAR: Connecticut Community for Addiction Recovery

CDS: Controlled Dangerous Substances

Credentialing: The administrative process for reviewing, verifying, and evaluating the qualifications and credentials to ensure individuals meet the necessary criteria to provide healthcare services.

DEA: Drug Enforcement Agency

Individual Practitioner: An individual who is engaged in the delivery of healthcare services.

MDHHS: Michigan Department of Health and Human Services

MSHN: Mid-State Health Network, the Pre-Paid Inpatient Health Plan responsible for oversight of delegated functions, including credentialing activities.

Primary Source Verification: The process by which an organization/entity corroborates the accuracy and validity of an individual provider's reported credentials and qualifications with the original source or allowable alternative source. Refer to Attachment A.

SUD: Substance Use Disorder

SUDSP: Substance Use Disorder Service Provider under contract with MSHN to provide SUD services; responsible for conducting credentialing and qualification verification.

Other Related Materials

Provider Network Management: Background Check Procedure

Provider Network Management: Disclosure of Ownership, Control and Criminal Convictions Procedure

Provider Network Management: Provider Appeal Procedure

Human Resources: MSHN Personnel Manual

References/Legal Authority:

- MDHHS SUD Credentialing and Staff Qualification Requirements
- MDHHS Medicaid Provider Manual
- LARA Administrative Rules R325.1301 – R325.1399
- 42 CFR 438.214
- 42 CFR 438.12

Change Log:

Date of Change	Description of Change	Responsible Party
2023	New – SUD Only Credentialing requirements	Compliance Administrator
12.2023	Procedure Update	PNMC, Compliance Administrator

Attachment A: Primary Source Verification (PSV)

A primary source is the original source of a specific credential that can verify the accuracy of a credential reported by an individual practitioner. PSV is received directly from the issuing source. For example, if information on state licensure status is verified directly with the licensing body, this is PSV. A copy of the license is not considered PSV.

PSV can be performed in several ways:

- Electronically through agency website (i.e. State licensure, MCBAP, etc.). If verified electronically, a screenshot or PDF version of the screen shall include the date the information was verified.
- Letters requesting the appropriate information are written to the primary source and responses are received directly from the primary source.
- Documentation of verification via telephone including the name of the agency called, date, the person contacted, the questions asked and responses, the name, date, and signature of the person receiving the response.

Information to Verify	Verification Source	When
Application	Agency Application Completed, signed, and dated application with no positively answered attestation questions	<input checked="" type="checkbox"/> Initially
Professional State Licensure	Any of the following: <ul style="list-style-type: none"> • LARA – Department of Licensing and Regulatory Affairs to verify a valid, current license • 	<input checked="" type="checkbox"/> Initially <input checked="" type="checkbox"/> Upon Expiration
Board Certification	Examples of board certification include (as applicable): <ul style="list-style-type: none"> • MCBAP • AMA/AOA Physician Masterfile • AOA Physician Profile Report • ASAM (medical doctors) • APA (Psychologists) <p>If a practitioner claims to be board certified, it must be verified.</p>	<input checked="" type="checkbox"/> Initially <input checked="" type="checkbox"/> Upon Expiration
Drug Enforcement Agency (DEA) or Controlled Dangerous Substances (CDS) for those prescribing controlled substances (MD, DO, mid-levels)	Any of the following: <ul style="list-style-type: none"> • Copy of the DEA or CDS Certificate • Confirmation on National Technical Information Service (NTIS Database) • Documented visual inspection and copy of the original certificate • Confirmation with DEA or CDS agency • AMA Masterfile (DEA only) • AOA physician profile report or AOA Physician Masterfile. 	<input checked="" type="checkbox"/> Initially <input checked="" type="checkbox"/> Upon Expiration
Specialized Training	Certifications, transcripts, verification of completion. Ex. CCAR	<input checked="" type="checkbox"/> Initially <input checked="" type="checkbox"/> Upon Expiration

<p>Medicaid/Medicare Exclusions</p>	<p>Any of the following:</p> <ul style="list-style-type: none"> • List of Excluded Independents and Entities maintained by the OIG; SAM, and MDHHS List of Sanctioned Providers • NPDB Query • AMA Physician Master File • FSMB <p><i>See MSHN Background Checks Procedure.</i></p>	<p><input type="checkbox"/> Initially <input type="checkbox"/> Monthly</p>
<p>Criminal History</p>	<p>iChat for Michigan or similar background check with same information as ICHAT. Michigan Offender Tracking Information System (OTIS) or a county level service that provides information on individuals involved with the court system are not appropriate resources.</p> <p><i>Refer to MSHN Background Checks Procedure & Disqualified Individuals Policy</i></p>	<p><input type="checkbox"/> Initially <input type="checkbox"/> Biennial</p>
<p>Central Registry</p>	<p>MDHHS Central Registry required for individuals working with children. https://www.michigan.gov/mdhhs/0,5885,7-339-73971_7119_50648_48330-180331--,00.html</p> <p><i>See MSHN Background Checks Procedure.</i></p>	<p><input type="checkbox"/> Initially</p>
<p>Michigan Public Sex Offender Registry</p>	<p>MSPOR https://mспsor.com/</p> <p><i>See MSHN Background Checks Procedure.</i></p>	<p><input type="checkbox"/> Initially</p>
<p>National Sex Offender Registry</p>	<p>NSOPW http://www.nsopw.gov</p> <p><i>See MSHN Background Checks Procedure.</i></p>	<p><input type="checkbox"/> Initially</p>