

## POLICIES AND PROCEDURE MANUAL

Chapter:	Provider Network Management			
Title:	Credentialing and Recredentialing – Organizational Providers			
Policy: □	Review Cycle: Biennial	Adopted Date:	Related Policies:	
Procedure: ⊠ Page: 1 of 6	Author: Chief Financial Officer, Contract Specialist	Review Date: 07.01.2025	Provider Network Management Credentialing/Re-credentialing Disqualified Providers	

### **Purpose**

The purpose of this operating procedure is to detail the process for Mid-State Health Network (MSHN) and Community Mental Health Service Participants (CMHSP) to follow when conducting credentialing and recredentialing activities of organizations to ensure compliance with the Michigan Department of Health & Human Services (MDHHS) Credentialing and Recredentialing Processes for organizational providers contracted to provide services.

### **Primary Source Verification (PSV)**

Organizational provider credentials must be verified by primary source. Any information found to vary from the application must be communicated to the applicant in writing within 30 days of application submission, prior to proceeding with the application process. The notice must include a timeframe for making corrections and the method/manner for submitting corrections.

Valid credentials are a condition of participation in the provider network. As applicable, the following require PSV – refer to Attachment A for PSV guidelines.:

- State Licensure, certification, and/or registration
- Accreditation status, as applicable;
- History of civil judgements;
- Medicare/Medicaid Exclusions and Sanctions (See MSHN Background Checks procedure)
- Liability insurance certificate

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

#### **Credentialing and Recredentialing**

For organizational providers included in its network, MSHN and CMHSPs must:

- 1. Require and subsequently validate at least every three years that:
  - a. The organizational provider completes the current credentialing application.
  - b. The organizational provider is licensed or certified and in good standing as necessary to operate in the State.
  - c. The organizational provider is approved by an accredited body (if a provider is not accredited, the PIHP must perform an on-site quality assessment).
  - d. There is a history check of civil judgements related to the delivery of a health care item or service.
  - e. The organizational provider is not excluded from participation in Medicare, Medicaid, or other federal contracts.
  - f. The organizational provider is not excluded from participation through the MDHHS Sanctioned
  - g. Current insurance coverage meeting contractual expectations is on fil.
  - h. For solely community-based providers (e.g., Applied Behavior Analysis (ABA) or Community

Living Supports (CLS) in private residences), an on-site review is not required. An alternative quality assessment is acceptable.

- i. The contract between the PIHP/CMHSP and any organizational provider specifies the requirement that the organizational provider must credential and re-credential their direct employees, as well as subcontracted service providers and individual practitioners in accordance with the PIHPs credentialing/re-credentialing policies and procedures (which must conform to MDHHS credentialing process).
- 2. Ensure that the credentialing of all organizational providers applying for inclusion into the network must be completed within 90 calendar days of application submission. The start time begins when the PIHP/CMHSP has received a completed signed and dated credentialing application from the organizational provider. Completion time is indicated with the written communication is sent to the organizational provider notifying them of the PIHP/CMHSP decision.

#### **Suspension and Revocation**

Circumstances that automatically suspend credentialing status:

- Lack of current licensure, certification, or registration The organizational provider does not possess a current, valid license, certification, or registration to operate in Michigan, including because a previously valid license has expired, lapsed, or has been suspended or revoked, or otherwise ceases to meet the qualification;
- Lack of current accreditation The organizational provider is not accredited by an approved accrediting body as defined by state or Federal requirement;
- Exclusion from government programs The organizational provider is excluded from or limited in participation in a federal or state health care program.

Credentialing suspension/revocation decisions will not include any information regarding status related to allegations or pending investigations in process associated with licensure or registration; MSHN and its CMHSPs support due process for all organizational providers in matters pertaining to unsubstantiated allegations of misconduct.

## **Credentialing Committee or Designated Authority**

A credentialing committee must be established and include members qualified to assess a provider's competencies and qualifications. The role of the credentialing committee is to:

- review the credentials of providers who do not meet the agency's criteria for participation in the network:
- give thoughtful consideration to credentialing information;
- document decisions about credentialing and recredentialing.

Evidence of approval is a handwritten signature, meeting minutes, initials or unique electronic signature if the agency has appropriate controls for ensuring that only the committee members can enter the electronic signature.

Applies to:	
□All MSHN Staff	
⊠Selected MSHN Staff, as follo	ws:
⊠MSHN CMHSP Participants:	□Policy Only ⊠Policy and Procedure
□Other:	

#### **Definitions:**

**ABA:** Applied Behavior Analysis **CLS:** Community Living Supports

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

**Credentialing Committee:** A group of individuals, selected by an organization, to review the professional backgrounds and qualifications of applicants to make the determination if individual meets the criteria to provide healthcare services.

**CMHSP:** Community Mental Health Services Participant in the MSHN Region with delegated authority to manage a network of behavioral health providers; responsible for conducting credentialing and recredentialing activities of its provider network in accordance with this procedure. NOTE: MSHN does not credential CMHSPs; however, requires annual attestation of accreditation status.

**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

**Organizational Provider:** includes an agency or facility which has a contract with a CMHSP or MSHN to provide some portion of specialty support services which MSHN has agreed to perform within its contract with MDHHS. Organizational providers are required to credential and re-credential their directly employed and subcontract direct service providers in accordance with the MSHN's credentialing/re-credentialing policies and procedures (which must conform to MDHHS's credentialing process).

PIHP: Prepaid Inpatient Health Plan

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

**Re-credentialing:** The ongoing administrative process for updating, reviewing, verifying, and evaluating the qualifications and credentials to ensure organizations meet the necessary criteria to provide healthcare services.

## **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 Credentialing & Re-credentialing Processes
- MDHHS Medicaid Provider Manual
- Public Act 282 of 2020
- 42 CFR 438.214
- 42 CFR 438.12

# **Change Log:**

Date of Change	Description of Change	Responsible Party
09.2019	Annual Review – Revised procedure entirely	Director, Provider Network Management Systems
11.2021	Biennial Review	Contract Specialist
05.2023	Revised and updated language in accordance with MDHHS Credentialing and Recredentialing Processes revision 3/24/23.	Compliance Administrator/Deputy Director
12.2023	Biennial Review	PNMC, Contract Specialist
1.2025	Revised language to align with updates to MDHHS FY25 contract and MDHHS Credentialing and Recredentialing Processes revision 11.18.24	Compliance Administrator

#### Attachment A: Primary Source Verification (PSV) Guidelines

A primary source is the original source of a specific credential that can verify the accuracy of a credential reported by an organizational provider. 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, NPDB, 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.

Designated Equivalent Sources: Verification of credentials through an agent that contracts with an approved source to provide credentialing information is allowed. Prior to using this method documentation must be obtained from the agent indicating that there is a contractual relationship between it and the approved source.

Verification time limit will be calculated from the date of verification to the date of the credentialing decision.

Information to Verify	Verification Source	When	Criteria	Verification Time Limit
Application	Agency Application	<ul><li>☑ C</li><li>☑ R</li><li>☐ E</li><li>☐ O</li></ul>	Completed, signed, and dated application	365 days
State licensure, if applicable	LARA – Department of Licensing and Regulatory Affairs	⊠ C ⊠ R ⊠ E □ O	License is in good standing.	180 days
Medicaid/Medicare Exclusions/Sanctioned providers	List of Excluded Individuals and Entities maintained by the OIG; SAM, and MDHHS List of Sanctioned Providers NPDB Query can be used for credenitaling and recredentialing. For ongoing monthly verification, NPDB can be used if continuous query was selected and did not expire. NPDP continuous query must be renewed annually.	⊠ C ⊠ R □ E ⊠ O	Provider is not on the Medicaid/Medicare or MDHHS sanction provider/excluded provider lists. Checks must be completed monthly.	Ongoing monthly
Malpractice Claims/Professional Liability History (criminal/civil history)	<ul> <li>Any of the following:</li> <li>NPDB Query</li> <li>Written confirmation of past history of malpractice history and verify with carrier</li> </ul>	⊠ C ⊠ R □ E □ O	Provider attestation is not sufficient.	180 days

Accreditation, if applicable.	Copy of Survey Report and/or verification from accreditation website.	⊠ C ⊠ R ⊠ E □ O	Full accreditation status during the last accreditation review.	180 days
C = credentialing	R = recredentialing $F = unon e$	vniration	O- Ongoing	

C = credentialing R = recredentialing E = upon expiration O-Ongoing