

PATHWAYS CMH

POLICY TITLE: Credentialing - Continuous Monitoring of Provider Network	CATEGORY: Personnel – Employee Guidelines	
EFFECTIVE DATE: June 4, 2014	BOARD APPROVAL DATE: June 4, 2014	
REVIEWED DATE: June 30, 2015	REVISION(S) TO POLICY STATEMENT: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	OTHER REVISION(S): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
RESPONSIBLE PARTY: COO/Human Resources Director	CEO APPROVAL: Mary Swift, CEO	

APPLIES TO:

Pathways Personnel
Pathways Contract Providers

POLICY:

Pathways is responsible for continuous monitoring of Pathways personnel as delegated by NorthCare Network to assure continuous credentialing monitoring of their staff and contract providers. Pathways conducts continuous monitoring of Pathways personnel and provides oversight and monitoring for credentialing functions delegated to Organizational Providers. Organizational Providers are responsible for continuous credentialing and oversight of their provider panels

PURPOSE:

Monitoring of individual and organizational practitioners on an ongoing basis for sanctions and for general compliance with Pathways credentialing policies and procedures between formal credentialing cycles supports consumer safety and the maintenance of a qualified provider panel.

DEFINITIONS:

1. **Credentialing – Individual Practitioners:** (As defined by the American Society of Addiction Medicine and the American Managed Behavioral Healthcare Association) The process of reviewing, verifying, and evaluating a practitioner's credentials (i.e., professional education, clinical training, licensure, board and other certification, clinical experience, letters of reference, other professional qualifications, and disciplinary actions) to establish the presence of the specialized professional background required for membership, affiliation, or a position within a healthcare organization or system. The result of credentialing is that a practitioner is granted membership in a medical staff or provider panel.

2. **Credentialing – Organizational Providers:** (As defined by MDCH Contract P.6.4.3.1) The process of validating 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 and that the organization properly credentials their directly employed and subcontract direct service providers.

REFERENCES:

- 42 CFR §438.610
- PIHP/MDCH Contract Section P.6.4.3.1
- URAC Standard P-CR-7, P-CR-10, P-CR-14, Core 30.d
- NorthCare Network Delegation Agreement FY13

HISTORY:

Dates Reviewed: June 30, 2015

Dates Revised:

Dates Approved: June 4, 2014

PROCEDURES

A. Sanctions or Limitations on Licensure

Pathways reviews Federal and State of Michigan information regarding individual practitioners and organizational providers who have received sanctions or limitations on licensure/certification from various agencies as they are published or made available.

1. Credentialing Staff will utilize the following sources for ongoing monitoring purposes:
 - a. Department of Health & Human Services (HHS) sanctioned provider information is available on the following websites: www.sam.org
 - b. MDCH licensing sanctions for health facilities and professionals are available at <http://michigan.gov/ara> and <http://michigan.gov/healthlicense> Michigan Department of Human Services (MDHS) licensing sanctions for Adult Foster Care and other residential settings licensed by MDHS are available at <http://michigan.gov/dhslicensing>
 - c. MDCH, Bureau of Health Professions, Disciplinary Action Report (<http://www.michigan.gov/mdch/0,1607-7-7-132-2939-43008--00.html>)
 - d. American Medical Association, Physician Masterfile System at <http://www.ama-assn.org/ama/pub/about-ama/physician-dataresources/physician-masterfile.page>
2. Pathways shall check the “Excluded Database” at <http://www.oig.hhs.gov> and the “Excluded Parties Listing System” at <http://www.epls.gov> before offering employment or a contract for services. A copy of the search results indicating “no results found” shall be placed in the personnel record or contract file. Pathways will search the Exclusion Lists at least monthly to capture exclusions and reinstatements that have occurred since the last search, or at any time providers submit new disclosure information.
3. Pathways requires all Screened Persons to disclose whether they are Excluded Individuals. All Screened Persons shall disclose if he/she/it is an Excluded Individual or Entity at the time of the initial hiring, credentialing, or contracting process, or at any point upon request by Pathways.
4. If Pathways has actual notice that an employed or contracted Screened Person has become an Excluded Individual, Pathways will remove (e.g., through termination of employment or the contract with the Excluded Individual) such Screened Person from responsibility for, or involvement in, the business operations related to any Federally Funded Health Care Programs or provision of items or services, directly, or indirectly, to Federally Funded Health Care Program beneficiaries and shall remove such persons from any position for which the Excluded Individual’s compensation or the items or services furnished, ordered, or prescribed by the Excluded Individual, are paid in whole or part, directly or indirectly, by Federally Funded Health Care Programs or otherwise with Federal funds. The Pathways Provider Directory will be updated within 45 days of exclusion from the network.

B. Expiration of Licensures

1. To ensure providers in the Pathways system have renewed their Michigan licenses and any applicable certifications in a timely basis, the Pathways credentialing staff will:
 - a. Run a monthly report to determine any provider with an upcoming license or certification, liability insurance and accreditation renewal.
 - b. Request updates to liability insurance and accreditation by sending the provider a letter of request.
2. Any Provider who has not renewed their license or any certification within applicable grace periods of its expiration will be immediately terminated from the provider network.
3. Providers who are terminated for lapsed licensure or certification may reapply for participation at the discretion of Pathways CEO once licensure or certification is renewed.

C. Other Identified Credentialing Issues

1. If a Pathways Participating Provider is listed on an ongoing disciplinary action report or other information source that determines lack of compliance to Pathways practice standards, Pathways will reassess the provider's ability to perform the services that he or she is under contract to provide.
2. Pathways Credentialing Committee will assess the information and will take action as deemed necessary.
3. The Pathways Credentialing Committee may:
 - a. Determine that no action is justified;
 - b. Issue a letter of guidance, warning, or reprimand;
 - c. Impose conditions for continued practice on the NorthCare Network provider network;
 - d. Impose a requirement for monitoring or consultation;
 - e. Recommend additional training or education;
 - f. Determine that the provider should be terminated for cause, as in the case of loss of license.
4. If a Provider becomes a Sanctioned Provider on the OIG Federal Exclusions List during the contract term, that contractor shall be removed from involvement with Pathways operations related to federal or state health care programs

D. Pathways/Contract Organization Ownership and Control Interests

1. Pathways may not have any of the following relationships with an individual who is excluded from participating in Federal health care programs:
 - a. Excluded individuals cannot be a director, officer, or partner of Pathways (this includes members of the governing board);
 - b. Excluded individuals cannot have a beneficial ownership of five percent or more of Pathways equity; and
 - c. Excluded individuals cannot have an employment, consulting, or other arrangement with Pathways for the provision of items or services that are significant and material to the Pathways obligations under its contract with the State/PIHP.
2. Pathways must notify NorthCare Network's CEO and/or Compliance Officer immediately if search results indicate that any of their network's provider entities, or individuals or entities with ownership or control interests in a provider entity are on the OIG exclusions database.
3. Pathways must notify the Division of Program Development, Consultation and Contracts, Mental Health and Substance Abuse Administration in MDCH immediately if search results indicate that any of their network's provider entities, or individuals or entities with ownership or control interests in a provider entity are on the OIG exclusions database.