



## **SALISH BHO**

### **HIPAA, 42 CFR PART 2, AND MEDICAID COMPLIANCE STANDARDS POLICIES AND PROCEDURES**

**Policy Name:** CREDENTIALING AND RECREDENTIALING OF PROVIDERS

**Policy Number:** 5.19

**Reference:** 42 CFR 438.214; State Contract

**Effective Date:** 7/2009

**Revision Date(s):** 12/2014

**Reviewed Date:** 5/2016; 6/2017; 5/2018

**Approved by:** SBHO Executive Board

#### **CROSS REFERENCES**

- Plan: Utilization Management Plan
- Policy: Corrective Action Plans
- Policy: Provider and Subcontractor Administrative Review

#### **PURPOSE**

The Salish Behavioral Health Organization (SBHO) shall monitor contracted provider agency and staff for compliance with credentialing and recredentialing contract requirements and federal regulations.

#### **PROCEDURE**

The SBHO only contracts for direct services with licensed behavioral health agencies.

The SBHO monitors network agency contractor compliance with credentialing and recredentialing through the following processes:

1. Contractor licensing and certification is monitored during the annual SBHO Administrative Reviews and monthly tracking of network written attestations of verification (from network agencies and CommCare).
2. Personnel background and federal exclusions are monitored annually through the SBHO Administrative Reviews.

- The SBHO review checklist includes verification of staff credentials, job description, current training plan, and background clearance(s). This process may be met by completion of the Credentialing packet (see 5.19(a)).
  - The SBHO reviews a random sample of personnel records for *newly hired* staff. The SBHO requires primary source verification of staff credentials, school diplomas/ degrees and trainings, licenses, job description, current training plan, and background clearance(s). The verification must be present in the personnel file.
  - Each network agency is required to disclose all individuals and entities with an ownership or controlling interest of the agency. This process may be met by completion of Medicaid Provider Disclosure Statement (see 5.19(b)).
3. Monthly Federal exclusions screenings are monitored through the SBHO. The SBHO Compliance Officer requires monthly attestation from each network agency that federal exclusions have been conducted on all staff, Board members, volunteers/ interns, and subcontractors.
    - Agency letters of attestation are due to the SBHO office by the 1<sup>st</sup> of each month.
    - SBHO Compliance Officer monitors the monthly attestations.
  4. Sub delegated Administrative Service Organization (ASO), CommCare, is required by contract to maintain URAC accreditation.
  5. The agency licensing process reviews and verifies personnel records of existing staff.

## **MONITORING**

1. This policy is a mandate by contract and statute. This policy is monitored through use of SBHO:
  - Annual SBHO Provider and Subcontractor Administrative/ Subdelegated Review
2. If a provider performs below expected standards during any of the reviews listed above a Corrective Action will be required for SBHO approval. Reference SBHO Corrective Action Plan Policy.