

COMMUNITY MENTAL HEALTH PARTNERSHIP OF SOUTHEASTERN MICHIGAN		<i>Policy and Procedure</i>	
Department: Provider Relations Unit Author: K. Gauthier		<i>Organizational Credentialing/Rec credentialing and Monitoring</i>	
		Local Policy Number (if used)	
Revision Date	Approval Date	Implementation Date	
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Date:			
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I. PURPOSE

To establish guidelines that ensure all organizational contractors who provide specialty support services to consumers within the Community Mental Health Partnership of Southeast Michigan (CMHPSM) and the Livingston-Washtenaw Coordinating Agency meet the minimum criteria and standards established by the CMHPSM/CA.

II. POLICY

The Washtenaw Community Health Organization (WCHO) will ensure that all organizations providing specialty support services to consumers in the Community Mental Health Partnership of Southeast Michigan (CMHPSM) and the Livingston-Washtenaw Coordinating Agency (CA) continuously meet the standards for quality and compliance set forth by the CMHPSM/CA.

Organizations who wish to provide specialty support services to consumers in the CMHPSM/CA will successfully complete an initial application for membership on the CMHPSM/CA network provider panel. Membership on the network panel is awarded by the WCHO Board. Panel membership is in no way a guarantee that an organization will be awarded a contract by any of the CMHPSM affiliate counties, nor does it ensure that the organization will receive referrals if contracted to provide services. CMHPSM/CA consumers may choose their providers from among the organizations on the network panel, and consumer choice is honored to every extent possible.

Contracts shall be issued to organizations on the network provider panel on an as-needed basis, taking into account network capacity and consumer choice. Once a contract is issued to an organization, the WCHO Provider Relations Unit (PRU) will monitor to ensure that the organization maintains the contractual agreement in good standing and complies with relevant accreditation, local, state, and federal requirements.

PRU will notify the Department of Community Health within seven (7) days of any significant changes to the CMHPSM/CA provider network panel.

- A. **CSSN Monitoring:** Any CSSN or CSSN look-alike that is contracting with the WCHO shall be annually reviewed to determine its capacity to provide delegated

services. Any area of less than full compliance will be addressed in a plan of correction that will be monitored by the Regional Performance Improvement Committee. Each CSSN or CSSN look-alike shall provide PRU with a copy of its current insurance certificate, the most recent accreditation report, and any additional information required by contract.

- B. **Hospital Credentialing:** Any hospital under contract with a CMHPSM affiliate will be credentialed by PRU staff prior to issuance of a contract. Credentialing shall include the verification of the hospital's license, accreditation, as well as verification that the hospital is not excluded from Medicaid or Medicare participation.
- C. **Organizational Credentialing:** The agency will complete an RFP application which will be reviewed and, as applicable, scored by PRU staff. PRU staff will conduct an on-site evaluation of the applicant's administrative practices using a standard monitoring tool. If the applicant is already serving CMHPSM/CA consumers, an on-site evaluation of the applicant's service delivery practices and verification of claims submitted will be conducted using a standard monitoring tool. If the applicant agency is not yet serving CMHPSM/CA consumers, the service delivery evaluation and verification of claims will be conducted after the organization has received referrals and is serving CMHPSM/CA consumers; within six months of being appointed to the provider panel, if possible.

The applicant organization must receive an acceptable score on its RFP application and initial site visit to be approved for appointment to the CMHPSM/CA network panel. If necessary, approval will be probationary pending the outcome of the service delivery site visit and claims verification. If the organization receives an acceptable score, it will receive notification from PRU that its probationary period has ended and it has full approval to the CMHPSM/CA network provider panel. If the score is not acceptable, PRU will bring this information to the WCHO Board with a recommendation of either denial to the CMHPSM/CA network panel, or provisional status.

Generally, a score of 80% or above shall be acceptable; however, an applicant may be denied to the network provider panel or granted provisional status if it receives a score of less than full compliance in a critical area.

If the organization is granted provisional approval, a plan of correction is required. PRU shall monitor the implementation of the plan of correction, and will provide consultation and technical assistance as needed. If the applicant can demonstrate that deficiencies were addressed, the relevant section of the site visit tool will be re-scored taking the new information into account. When the applicant has achieved an acceptable score, PRU will recommend removing the provisional status. The WCHO Board will determine if provisional status is removed.

Any applicant organization that is debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or agency will be denied membership to the CMHPSM/CA provider network panel.

- D. **Organizational Monitoring:** The CMHPSM/CA expects that all contracted agencies providing specialty support services to consumers shall:
1. Not be presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency (may be verified through the Michigan Department of Consumer and Industry Services and/or the federal “excluded parties” list);
 2. Remain in good standing with all regulatory bodies and report to PRU any issues as they arise;
 3. Maintain current insurance and licensure as required by contract and provide evidence of same;
 4. Respond promptly and effectively to any Recipient Rights findings, grievances or other complaints, or service delivery concerns;
 5. Participate as appropriate in administrative and service delivery monitoring and quality improvement efforts;
 6. Address any deficiencies found during monitoring activities in a timely manner by submitting a plan of correction within the timeframe required by PRU; and
 7. Maintain active accreditation by the Joint Commission on Accreditation of Healthcare Organizations (JCAHO), the Rehabilitation Accreditation Commissions (CARF), or other nationally recognized accrediting body as approved by the CMHPSM Network Management Committee.

Under limited circumstances, this accreditation requirement may be waived by the CMHPSM Network Management Committee:

- No national accreditation standards exist for the type of service provided;
- The provider’s scale of business does not support the administrative burden of obtaining and maintaining accreditation;
- The provider has in place a plan to achieve accreditation which has been approved by the CMHPSM and is being implemented; or
- Other reasons as deemed appropriate by the CMHPSM Network Management Committee.

If the accreditation requirement has been waived by the CMHPSM Network Management Committee, the organization must remain in compliance with any applicable standards of the Joint Commission on Accreditation of Health Care Organizations as they relate to the WCHO and its subcontractors. The accreditation requirement may not be waived for providers of substance abuse treatment or prevention services.

- E. **Organizational Recredentialing:** An organization that has been appointed to the CMHPSM/CA network panel but has not been issued a contract or has not provided specialty support services to any CMHPSM/CA consumer for two years (an “inactive” organization), will be contacted in writing to determine its interest in remaining on the network panel. If the organization indicates that it would like to remain on the panel, PRU will recredential the organization, which will remain on the network panel if all required information is provided and a satisfactory recredentialing score is achieved.

In order to ensure the continuous quality of specialty supports service providers in the CMHPSM/CA provider network, PRU will recredential organizations that have an active contract during the course of ongoing monitoring, rather than on a periodic basis. Annual monitoring will include a check of the federal and state excluded providers list. Additionally, the CMHPSM Network Management Committee reviews performance improvement indicator data quarterly and considers this information in making recredentialing decisions.

- F. Out-of-Network Providers:** If the CMHPSM/CA network provider panel is unable to accommodate a consumer's needs, the affiliate county within the CMHPSM that serves the consumer shall contract with an out-of-network provider to provide services. All out-of-network providers will be assessed for their ability to provide quality services; if the provider is delivering services to another PIHP, PRU may opt to rely on that PIHP's credentialing decision. Generally, PRU will attempt to add the out-of-network provider to the CMHPSM/CA network provider panel by asking the provider to apply to an RFP and providing any assistance needed to facilitate the application process. However, the provider will remain an out-of-network provider if the provider's distance or rates is such that it is not desirable for frequent usage, or if the use of the provider was intended to be temporary or limited.
- G. Delegation:** If the responsibility for credentialing/recredentialing or selection of individual practitioners has been delegated to a subcontracted agency, the CMHPSM affiliates and the CA retain the right to approve, suspend, or terminate their use of each staff person or contracted individual who is credentialed under such delegation. PRU may review the credentialing/ recredentialing process used by subcontracted organizations when monitoring those providers.
- H. Reporting:** PRU shall ensure that improper known provider misconduct is reported to the appropriate authorities (i.e., DCH, the provider's regulatory board or agency, and/ or the Attorney General, etc), if such conduct results in the suspension or termination from the CMHPSM/CA provider network. Any such suspension or termination shall be recommended by the CMHPSM Network Management Committee and approved by the WCHO Board.

Reporting procedures will be consistent with current federal and state requirements, including those specified in the DCH Medicaid Managed Specialty Supports and Services Contract.

III. APPLICATION

The Comprehensive Specialty Services Network and all organizations applying to the CMHPSM/CA provider network panel, and those under contract with a community mental health board within the CMHPSM to provide specialty support services to consumers.

IV. DEFINITIONS

Comprehensive Specialty Services Network (CSSN) - An organization that is certified as a CMHSP, including a recipient rights systems, services across all populations, a publicly appointed Board of Directors, and accreditation from JCAHO.

Comprehensive Specialty Services Network Look-Alike (CSSN look-alike) - A public entity with a publicly appointed Board of Directors or a Board of Directors composed of elected officials, services across all populations, and accreditation from JCAHO.

Out-of-Network Provider - A provider of specialty support services who is not on the CMHPSM/CA network panel for that service

Probationary Status - Temporary approval to the CMHPSM/CA network provider panel, which will be replaced with full approval when an on-site evaluation of the provider's service delivery practices occurs and an acceptable score is achieved. Probationary status is awarded due to a lack of information about the provider's service delivery practices; otherwise, the provider is acceptable for membership to the CMHPSM/CA network provider panel.

Provisional Status - A means of sanctioning a contracted provider or an applicant to the CMHPSM/CA network provider panel. Provisional status may result in a required plan of correction, temporary suspension of referrals, removing consumers currently served by the provider, or other sanctions up to termination of the contract or denial to the panel.

PRU -The Provider Relations Unit of the Washtenaw Community Health Organization, which provides services to the CMHPSM/CA including: managing RFPs, credentialing/recredentialing of providers and monitoring of providers.

V. STANDARDS

None

VI. EXHIBITS

None

VII. REFERENCES

Reference:	Check if applies:	Standard Numbers:
42 CFR Parts 400 et al. (Balanced Budget Act)	X	438.214, 438.230
JCAHO- Behavioral Health Standards	X	HR 4.10, 4.20, 4.30, 4.50 (06/07)
MDCH Medicaid Contract	X	Section 6.4
DCH Credentialing and Re-Credentialing Process Policy	X	
CMHPSM Financial Fraud and Abuse Reporting Policy	X	

VIII. PROCEDURES

A. Initial Credentialing

<u>WHO</u>	<u>DOES WHAT</u>
Organization Applying to CMHPSM/CA Network Provider Panel	1. Submits an initial provider network panel application to Washtenaw County Purchasing Division in response to a Request for Proposals issued by the WCHO on behalf of the CMHPSM/CA.
PRU Staff	<ol style="list-style-type: none">2. Receives the completed RFP application from the Washtenaw County Purchasing Division.3. Communicates with the applicant organization regarding any missing or incomplete materials, or to request additional information as necessary.4. Creates a provider profile in Encompass5. Reviews and scores the RFP application as applicable; verifies the applicant's credentials; and, using a standard monitoring tool, conducts an initial on-site evaluation of administrative practices to arrive at a score for the organization. If possible, conducts a site visit to review the organization's service delivery practices and verify submitted claims.6. Completes a site visit report and sends it to the organization within 21 working days of the site visit.7. Reviews all relevant information, and makes a recommendation to the Regional Subcommittee of the WCHO Board (for mental health providers) or the Organization Operations Subcommittee of the WCHO Board (for substance abuse providers).
Sub-committee of the WCHO Board	<ol style="list-style-type: none">1. Makes final decision whether to approve or deny the organization to the CMHPSM/CA network provider panel.
PRU Staff	<ol style="list-style-type: none">1. Informs the Washtenaw County Purchasing Division of the Board's decision and ensures that an award or denial letter is sent to the organization. Denial letters will include the reason for the denial and appeal information.2. If the organization is appointed to the CMHPSM/CA network provider panel, notifies CMHPSM/CA staff of the new provider's availability.

3. If probationary approval is awarded, conducts a site visit to review the organization's service delivery practices after it has begun providing specialty support services to CMHPSM/CA consumers; claims verification will also occur at this site visit.
4. Completes a site visit report and sends it to the organization within 21 working days. If an acceptable score is achieved, notifies the provider that it is a full member of the provider panel (probationary period has expired). If an acceptable score is not achieved, makes a recommendation to the relevant sub-committee of the WCHO Board.
5. Ensures that any area of deficiency is addressed by the organization in a plan of correction. In the event that the organization is granted provisional approval, provides consultation and technical assistance as needed; and communicates regularly with CMHPSM/CA staff regarding the status of the provider.

B. Re-Credentialing of an "Inactive" Provider

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| PRU Staff | 1. Prior to the end of the organization's second year on the CMHPSM network panel, contacts the "inactive" provider to determine its interest in remaining on the panel. |
| Inactive Provider | 1. Notifies PRU staff of its decision to remain on the CMHPSM network provider panel. |
| PRU Staff | 1. Collects recredentialing information and performs a site visit, if the organization has indicated a preference to remain on the provider panel, <i>OR</i> recommends removal of the provider agency from the network provider panel. |
| Sub-committee of the WCHO Board | <ol style="list-style-type: none"> 1. Ensures that any deficiencies noted at the site visit are addressed through a plan of correction. 2. Makes final decision to remove the organization from the network provider panel. |

C. Organizational Recredentialing

NOTE: Recredentialing of an organization currently contracting with a CMHPSM affiliate will occur during the process of ongoing monitoring rather than at periodic intervals, and will not require a Board action.

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| Organizational Provider | <ol style="list-style-type: none"> 1. Provides PRU with copies of insurance certificate, accreditation report, and other relevant documents as updated or as requested by PRU; 2. Reports to PRU any changes to or problems with licensure, |
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insurance coverage, financial viability, or other issues as they arise.

3. Participates in monitoring activities.

PRU Staff

1. Performs primary source verification of licenses and sanctioned provider check; reviews data gathered on the provider; conducts monitoring activities and plan of correction follow-up.
2. If a determination has been made that the provider should not remain on the CMHPSM/CA network provider panel, prepares a recommendation to the appropriate Subcommittee of the WCHO Board.

Sub-committee of the WCHO Board

1. Makes final decision to deny an organization's recredentialing to the CMHPSM/CA network provider panel.

D. Organizational Monitoring

Organizational Provider

1. Participates in monitoring activities by PRU and/or the WCHO Finance Department, in conjunction with the affiliate community mental health agencies with whom the organization contracts.
2. Responds quickly and effectively to any substantiated Recipient Rights complaint or grievance filed by or on behalf of a consumer, or any identified service delivery concerns; and
3. Participates in ongoing performance improvement activities and reports PI and other data in accordance with contractual requirements.

PRU Staff

1. Coordinates monitoring activities, including communications with contracted providers regarding any required information that must be submitted; and conducts site visits according to a schedule established annually by PRU and approved by the CMHPSM Network Management Committee;
2. Requires a plan of correction from providers to address identified deficiencies, and monitors and/or provides technical assistance to ensure that the plan of correction is implemented.
3. In the event that a provider is placed on provisional status or otherwise sanctioned, communicates with the provider agency, CMHPSM/CA staff, and the WCHO Board as needed. Provides oversight and/or technical assistance to the provider as needed to assist in improving the provider's practices.

E. Out-of-Network Provider

CMHPSM affiliate	<ol style="list-style-type: none">1. Determines that a consumer is in need of specialty support services that cannot be provided by a provider on the CMHPSM/CA network provider panel.2. Informs PRU of the need for an out-of-network provider.
PRU Staff	<ol style="list-style-type: none">1. Working with CMHPSM/CA staff, locates an out-of-network provider and obtains information about the provider, including but not limited to:<ul style="list-style-type: none">• Disbarred/sanctioned provider check;• Program description and rates;• Proof of licensure, if applicable, and review of any licensing reports;• Proof of current insurance;• Most recent accreditation report;• Most recent PI plan and PI data report.2. If the provider is currently contracting with another community mental health agency or coordinating agency in the state of Michigan, PRU may request:<ul style="list-style-type: none">• Information related to Recipient Rights activity and history;• A copy of the most recent site visit/monitoring report; and/or• A copy of the CMH/CA credentialing decision3. When all necessary information is collected, discusses with CMHPSM/CA staff to determine if the provider is acceptable.
CMHPSM Affiliate Staff	<ol style="list-style-type: none">1. Conducts contract negotiations with the provider, if necessary;2. Asks local Board for contract approval and issues a contract to the provider.3. Notifies the local Office of Recipient Rights of the out-of-network placement of a consumer of mental health services.
Network Management Committee	<ol style="list-style-type: none">1. Monitors the use of out-of-network providers.
PRU Staff	<ol style="list-style-type: none">1. Contacts out-of-network provider, when appropriate, to determine its interest in joining the CMHPSM/CA network provider panel and provides assistance as needed in the application process.