

Effective Date: 7/1/2019

Review Date: 10/8/2024

Revised Date: 10/1/2024

## North Sound Behavioral Health Administrative Services Organization, LLC

Section 1000 - Administrative: Organizational Provider Credentialing

Authorizing Source: HCA Contract; MCO Contract

Approved by: Executive Director      Date: 10/8/2024

Signature:

### POLICY 1027.00

#### SUBJECT: ORGANIZATIONAL PROVIDER ASSESSMENT

##### I. Program Purposes and Objectives

North Sound Behavioral Health Administrative Services Organization (North Sound BH-ASO) is committed to providing quality care and services to individuals and families receiving behavioral health services. To help support this goal, North Sound BH-ASO completes an assessment of organizational providers with whom it contracts and performs a credentialing process. In addition, North Sound BH-ASO completes a reassessment of all contracted organizational providers every 36 months. Behavioral health providers are required to meet established criteria. North Sound BH-ASO does not contract with organizational providers that do not meet the established criteria.

The decision to accept or deny an organizational provider is based upon primary source verification, secondary source verification, and additional information as required. The information gathered is confidential and disclosure is limited to parties who are legally permitted to have access to the information under state and federal law.

##### II. Type of Organizational Providers Assessed

The organizational provider types assessed may include, but are not limited to, the following Agencies:

a. Agencies	b. Ambulatory Facilities	c. Hospitals	d. Nursing/Custodial Facilities	e. Residential Facilities	f. Other Atypical *
Behavioral Health Agency (BHA)	Adult Behavioral Health Center Rehabilitation Center	N/A	Assisted Living Facility Assisted Living, Behavioral Disturbances Assisted Living, Mental Illness Intermediate Care Facility, Mental Illness	Community Based Residential Treatment Facility, Mental Illness Psychiatric Residential Treatment Facility, Residential Treatment Facility, Mental Illness Youth/Children Substance Abuse Disorder Rehabilitation Facility, Substance Use Disorder	Supported Employment

				Rehabilitation Facility, Children/Youth	
--	--	--	--	---	--

**\*Atypical providers** do not provide health care. This is further defined under the Health Insurance Portability and Accountability Act (HIPAA) in Federal regulations and at 45 CFR 160.103. Taxi services, home and vehicle modifications, and respite services are examples of atypical providers reimbursed by the Medicaid program. Even if these atypical providers submit HIPAA transactions, they still do not meet the HIPAA definition of health care and do not receive an NPI number. Therefore, atypical providers will not have a Taxonomy code.

**III. Approved Accrediting Agencies**

Approved accrediting agencies accepted by North Sound BH-ASO are any accrediting agencies that have been deemed by The Centers for Medicare & Medicaid Services (CMS). These include, but are not limited, to the following:

- a. Accreditation Association for Ambulatory Health Care (AAAH);
- b. The Accreditation Commission for Health Care, Inc. (ACHC);
- c. Board of Certification/Accreditation International (BOC);
- d. Commission for Accreditation of Rehabilitation Facilities (CARF);
- e. Community Health Accreditation Program (CHAP);
- f. Center for Improvement in Healthcare Quality (CIQH);
- g. The Council on Accreditation (COA);
- h. Compliance Team;
- i. DNV Healthcare Inc. (DNVHC);
- j. Healthcare Quality Association Accreditation (HQAA);
- k. National Committee for Quality Assurance (NCQA);
- l. The Joint Commission (TJC);
- m. Utilization Review Accreditation Commission (URAC).
- n. American Association of Suicidology (AAS)
- o. CLIA (Clinical Laboratory Improvement Amendments) Waiver as outlined by the Centers for Medicare & Medicaid Services (CMS)

**IV. Criteria for Participation in the North Sound BH-ASO Network**

North Sound BH-ASO has established criteria and sources used to verify these criteria for the evaluation and selection of behavioral health organizational providers for participation in the North Sound BH-ASO network. This policy defines the criteria that are applied to applicants for initial participation, and ongoing participation in the North Sound BH-ASO network.

North Sound BH-ASO reserves the right to exercise discretion in applying any criteria and to exclude behavioral health organizational providers who do not meet the criteria. To remain eligible for participation organizational providers must continue to satisfy all applicable requirements for participation as stated herein and in all other documentation provided by North Sound BH-ASO. Behavioral health organizational providers must meet the following criteria to be eligible to participate in the North Sound BH-ASO network. If the organizational provider fails to provide proof of meeting these criteria, the application will be deemed incomplete and it will result in an administrative denial or termination from the North Sound BH-ASO network (with the exception of when the Provider is approved under “watch status” as described in section XVII.b below). Behavioral health organizational

providers that have been denied initial network participation by the Credentialing Committee are not eligible to reapply for participation until one (1) year after the date of denial, unless deemed an exception by the North Sound BH-ASO. Behavioral health organizational providers terminated by the Credentialing Committee or terminated from the network for cause are not eligible to reapply until two (2) years after the date of termination. At the time of reapplication, the behavioral health organizational provider must meet all criteria for participation as outlined below.

Criteria	Verification Source	Applicable provider types	Time limit	When required
<p><b>Application</b> Organizational provider must submit a complete, signed, and dated credentialing application. The application must be typewritten or completed in non-erasable ink. Application must include all required attachments.</p> <p>The organizational provider must sign and date the application attesting their application is complete and correct within 180 calendar days of the credentialing decision. If the organizational provider’s attestation exceeds 180 days before the credentialing decision, the organizational provider must attest to the information on the application remains correct and complete but does not need to complete another application. It is preferred to send a copy of the completed application with the new attestation form when requesting the organizational provider to update the attestation.</p> <p>If North Sound BH-ASO or the Credentialing Committee requests any additional information or clarification, the organizational provider must supply that information in the time-frame requested.</p>	<ul style="list-style-type: none"> <li>• Every section of the application is complete or designated N/A</li> <li>• The attestation is signed and dated within 180 calendar days of the credentialing decision</li> <li>• Every question must be answered and include a detailed explanation where the application indicates necessary.</li> </ul>	All provider types	180 Calendar days	Initial Assessment & Reassessment

Criteria	Verification Source	Applicable provider types	Time limit	When required
<p>Any changes made to the application must be initialed and dated by the organizational provider. White-out may not be used on the application. Rather the incorrect information must have a line drawn through it with the correct information written/typed in.</p> <p>All reassessment information must be submitted by the organizational provider within the timeframe requested.</p> <p>The application and/or attestation documents cannot be altered or modified.</p>				
<p><b>License, Certification, Registration</b>  If applicable to operate in the state, organizational provider must hold a current, valid license, certification or registration to operate in their specialty area(s) in every state in which they will provide care and/or services for North Sound BH-ASO Members.</p>	<p>Verified directly with the agency that issued the license, certification or registration. This verification is conducted by one of the following methods:</p> <ul style="list-style-type: none"> <li>• On-line directly with agency</li> <li>• Confirmation directly from the agency documented in writing</li> <li>• A provided copy of the licensure</li> </ul> <p>The verification must include:</p> <ul style="list-style-type: none"> <li>• The scope/type of license, certification or registration</li> <li>• Expiration date of licensure, certification or registration, if applicable</li> </ul>	<p>All applicable provider types</p>	<p>180 Calendar days</p>	<p>Initial Assessment &amp; Reassessment</p>

Criteria	Verification Source	Applicable provider types	Time limit	When required
	<ul style="list-style-type: none"> <li>• Current status of license, certification or registration</li> </ul>			
<p><b>Organizational provider’s credentialing program</b> The organizational provider must attest to verifying the following on their application for all of their employees rendering services for the organization:</p> <ol style="list-style-type: none"> <li>1. The appropriate state license, certification or registration source is checked for all new employees or contracted service providers prior to rendering services. The license, certification or registration must be current and in good standing with the state where they will be rendering services to North Sound BH-ASO Members. The organizational provider will check the appropriate state license, certification or registration source at least annually and upon expiration for existing and contracted service providers in order to ensure that every employee providing services holds a current license, certification or registration in good standing.</li> <li>2. On-line exclusion lists for the HHS Office of Inspector General (OIG) and System Award</li> </ol>	<ul style="list-style-type: none"> <li>• The attestation must be current within 180 calendar days of the credentialing decision.</li> <li>• Every question must be answered and include a detailed explanation where the application indicates necessary.</li> </ul>	All provider types	180 Calendar days	Initial Assessment & Reassessment

Criteria	Verification Source	Applicable provider types	Time limit	When required
<p>Management (SAM) for all new employees, care providers, prior to providing services and existing employees or contracted service providers and on a monthly basis to ensure that no state or federally excluded individual(s) perform(s) any function related to any state or federal health care program. The organizational provider will remove any employee or contracted service provider found on one of the above referenced federal exclusion lists from any functions related to a state or federal health care program.</p> <p>3. Criminal background checks are conducted for all new employees or contracted service providers prior to the first provision of service. The organizational provider does not employ or contract with any individual convicted of a felony for a health-care related crime, including, but not limited, to health care fraud, patient abuse and the unlawful manufacture, distribution, prescription, or dispensing of controlled substance(s).</p>				
<p><b>State sanctions, restrictions, limitations or conditions of license, certification or</b></p>	<p>The organizational provider must answer all the questions in the</p>	<p>All provider types</p>	<p>180 Calendar days</p>	<p>Initial Assessment &amp; Reassessment</p>

Criteria	Verification Source	Applicable provider types	Time limit	When required
<p><b>registration, sanctions by Medicare/Medicaid, accrediting agencies or state and federal agencies</b></p> <p>At the time of initial application, the organizational provider’s state license(s), certification(s) and or registration(s) must be currently free of any restrictions, limitations, conditions or sanctions (formal or informal) and there should be no such open or pending investigations. The organizational provider also must not have any of the following sanctions/exclusions imposed by Medicare, Medicaid, accrediting agencies or other state and federal agencies:</p> <ol style="list-style-type: none"> <li>1. Stop placement status</li> <li>2. Denial of payment status</li> <li>3. Temporary management status</li> <li>4. Pending state charges, actions</li> <li>5. Excluded or expelled status</li> <li>6. Loss of accreditation, licensure or certification status</li> </ol> <p>At the time of reassessment, if the organizational provider is found to have any of these sanctions, restrictions, limitations or conditions, they will be deemed not eligible and will be required to adhere to the timelines for resubmission.</p>	<p>credentialing program pertaining to these issues and will provide explanations to answers where indicated.</p> <p>In addition, all of the following sources are verified directly and if there are any sanctions, restrictions or limitations, completed documentation regarding the action will be obtained from the agency:</p> <ul style="list-style-type: none"> <li>• Agency(s) issuing the license(s), certification(s) or registration(s)</li> <li>• The HHS Office of Inspector General (OIG) web site.</li> <li>• The System for Award Management (SAM) website is queried</li> <li>• Applicable state Medicare/Medicaid agency(s) who publish lists of sanctioned/excluded providers</li> <li>• Applicable Accrediting agency(s)</li> </ul>			
<p><b>Disclosure of Ownership and Controlling Interest for Organizational Provider -Form</b></p> <p>The organizational provider, person(s) with ownership or</p>	<p>Organizational provider completes the Disclosure of Ownership and Controlling Interest form by indicating each individual who has</p>	<p>All provider types</p>	<p>36 Months</p>	<p>Initial Assessment &amp; Reassessment</p>

Criteria	Verification Source	Applicable provider types	Time limit	When required
<p>controlled interest with the organizational provider and managing employees of the organizational provider must not have ever been:</p> <p>a) Convicted of a felony or pled guilty to a felony for a health-care related crime, including but not limited to health care fraud, patient abuse and the unlawful manufacture, distribution, prescription, or dispensing of controlled substance.</p> <p>b) Excluded, expelled or suspended from any federally funded programs, including but not limited to, the Medicare or Medicaid programs</p> <p>c) Excluded, expelled or suspended from any state funded programs including but not limited to Medicare or Medicaid.</p> <p>If an organizational provider indicates they are entirely state or federally funded on the Disclosure of Ownership and Controlling Interest form, the organizational provider is only required to sign and date the form and does not have to complete any additional sections of the form.</p>	<p>ownership and/or a controlling interest in the organization. The organizational provider will also answer all questions on the form pertaining to these issues and will provide detailed explanations to any yes answers.</p>			
<p><b>Disclosure of Ownership and Controlling Interest for Organizational Provider – Verification of Information</b></p> <p>The following categorical details are collected and required on the Disclosure of Ownership and Control Interest during the credentialing and recredentialing process:</p>	<p>North Sound BH-ASO searches the following sources for all individual names and entities listed on the Disclosure of Ownership and Control Interest Form:</p> <ul style="list-style-type: none"> <li>The HHS- Inspector General, Office of Inspector General (OIG) web site.</li> </ul>	<p>All provider types</p>	<p>180 Calendar Days</p>	<p>Initial Assessment &amp; Reassessment</p>



Criteria	Verification Source	Applicable provider types	Time limit	When required
<p>a) Detailed identifying information for any individual who has ownership or controlling interest in the individual/entity being contracted if that individual has a history of criminal activity related to Medicaid, Medicare, or Title XX services (see 42 CFR §455.106).</p> <p>b) Detailed identifying information for all individuals who exercise operational or managerial control either directly or indirectly over daily operations and activities (see 42 CFR §455.101).</p> <p>c) Detailed identifying information for all individuals or entities that have a 5% or more ownership or controlling interest in the individual/entity being contracted (see 42 CFR §455.104)</p>	<ul style="list-style-type: none"> <li>• The System for Award Management (SAM) website</li> <li>• Medicare Opt-Out</li> <li>• Each state’s specific Program Integrity Unit</li> </ul>			
<p><b>Accreditation or Certification for residential or ambulatory behavioral healthcare providers and all other organizational providers that are licensed, registered or certified.</b></p> <p>Organizational provider must meet at least one of the following requirements:</p> <p>a) Be accredited through an accrediting agency that has approval from the Centers for Medicare and Medicaid (CMS) services for deeming authority of accreditation.</p> <p>b) Non-accredited organizational providers must be approved and have passed inspection by</p>	<p>For organizational providers that are accredited, North Sound BH-ASO primary source verifies the accreditation is current and in good standing directly with the accrediting agency.</p> <p>For organizational providers that are non-accredited, North Sound BH-ASO obtains evidence of one of the following:</p> <p>a) A copy of the most recent CMS or state survey including approved corrective action(s).</p>	<p>Residential and Ambulatory Behavioral Healthcare Providers and All other organization al providers that are licensed, registered or certified.</p>	<p>180 Calendar days</p>	<p>Initial Assessment &amp; Reassessment</p>

Criteria	Verification Source	Applicable provider types	Time limit	When required
<p>CMS or the applicable state agency.</p> <p>The CMS or state survey may not be greater than three years old at the time of verification for inpatient, residential or ambulatory behavioral healthcare providers.</p> <p>If an organizational provider is pending corrective action for an inspection conducted by CMS or applicable state agency, North Sound BH-ASO will conduct an onsite review. The results of this review will be provided to the credentialing committee for decision making. If the Credentialing Committee votes to approve, the organizational provider will be placed on a pending status to follow up on compliance with the corrective action.</p> <p>c) North Sound BH-ASO conducts an onsite quality assessment if the organizational provider does not meet one of the two previously listed criteria under A or B.</p> <p><b>POLICY EXCEPTION:</b> North Sound BH-ASO conducts site visits for non-accredited organizational providers when the state or CMS has not conducted a site review and where quality and/or performance concerns are identified when the provider is in a rural area as defined by the U.S. Census Bureau.</p>	<p>b) A copy of a letter from CMS, or the applicable state agency which shows the facility agency, that shows the facility was reviewed and indicates it passed inspection.</p> <p>c) Primary source verification directly from CMS or the state indicating the survey was completed and passed inspection.</p> <p>For organizational providers not accredited or who have not had a CMS or state survey, a quality assessment will be completed by North Sound BH-ASO and will not be more than 180 days at the time of decision.</p>			

Criteria	Verification Source	Applicable provider types	Time limit	When required
<p><b>Professional Liability Insurance</b> Organizational provider must have current professional malpractice liability coverage with limits that meet North Sound BH-ASO criteria specifically outlined in this policy. The insurance must be through a commercial carrier or statutory authority.</p> <p>If a facility does not meet the insurance requirements, as listed in Addendum A, the North Sound BH-ASO may use their discretion to determine if the limits and coverage are acceptable.</p>	<p>Professional liability insurance is verified by one of the following methods:</p> <p>A copy of the insurance certificate showing:</p> <ul style="list-style-type: none"> <li>• Name of commercial carrier or statutory authority</li> <li>• The type of coverage is professional liability or medical malpractice insurance</li> <li>• Dates of coverage (must be currently in effect)</li> <li>• Amounts of coverage</li> <li>• Name of the organizational provider</li> <li>• Certificate must be legible</li> </ul> <p>Current organizational provider application attesting to current insurance coverage. The application must include the following:</p> <ul style="list-style-type: none"> <li>• Name of commercial carrier or statutory authority</li> <li>• The type of coverage is professional liability or medical malpractice insurance</li> <li>• Dates of coverage (must be currently in effect)</li> <li>• Amounts of coverage</li> </ul>	All provider types	Must be in effect at the time of decision	Initial Assessment & Reassessment

Criteria	Verification Source	Applicable provider types	Time limit	When required
	<p>Organization providers maintaining coverage under a federal tort or self-insured are not required to include amounts of coverage on their application for professional or medical malpractice insurance. A copy of the Federal Tort or Self-Insured letter or an attestation from the organizational provider showing active coverage are acceptable.</p> <p>Confirmation directly from the insurance carrier verifying the following:</p> <ul style="list-style-type: none"> <li>• Name of commercial carrier or statutory authority</li> <li>• The type of coverage is professional liability or medical malpractice insurance</li> <li>• Dates of coverage (must be currently in effect)</li> <li>• Amounts of coverage</li> </ul>			
<p><b>DEA or CDS Certificate</b> If applicable to the organizational provider type, provider must have a current and unrestricted federal Drug Enforcement Agency (DEA) or Controlled Dangerous Substances (CDS) certificate.</p>	<ul style="list-style-type: none"> <li>• On-line directly with the National Technical Information Service (NTIS) database.</li> <li>• On-line directly with the U.S. Department of Justice Drug Enforcement Administration, Office of Diversion Control</li> </ul>	Applicable provider types	Must be in effect at the time of decision and verified within 180 Calendar Days	Initial Assessment & Reassessment

Criteria	Verification Source	Applicable provider types	Time limit	When required
	<ul style="list-style-type: none"> <li>• Current, legible copy of DEA or CDS certificate</li> <li>• On-line directly with the state pharmaceutical licensing agency, where applicable</li> </ul>			
<b>NPI</b> Organizational provider must have a National Provider Identifier (NPI) issued by the Centers for Medicare and Medicaid Services (CMS).	<ul style="list-style-type: none"> <li>• On-line directly with the National Plan &amp; Provider Enumeration System (NPPES) database.</li> </ul>	All provider types except atypical provider types	180 Calendar Days	Initial Assessment & Reassessment

### **Burden of Proof**

The organizational provider shall have the burden of producing adequate information to prove they meet all criteria for initial participation and continued participation in the North Sound BH-ASO network. If the organizational provider fails to provide this information, the application will be deemed incomplete and it will result in an administrative denial or termination from the North Sound BH-ASO network.

### **The Assessment File**

North Sound BH-ASO creates and maintains an electronic file for each organizational provider that applies for participation in the North Sound BH-ASO network. Electronic files are maintained in a document management system.

Primary Source Verification as described above is completed by the North Sound BH-ASO Credentialing Administrative Staff and is maintained in a secure file that with limited access (modifications are restricted to only the Credentialing Administrative Staff, the Compliance Officer (or designee). Once verification information is obtained it is not modified other than for affixing the date and initials (signature) of the person completing the verification.

- a. To prevent an unauthorized modification of verification documents, North Sound BH-ASO utilizes IT software that automatically records the identity of the person modifying the submitted documents and the date/time of such a the modification.

All information relating to the organizational providers described throughout this policy are retained in the file. North Sound BH-ASO retains all this information for every assessment cycle for ten (10) years following the end of the providers association with North Sound BH-ASO.

## **V. Credentialing Application**

At the time of initial assessment and reassessment, the organizational provider must complete an application designed to provide North Sound BH-ASO with information necessary to perform a comprehensive review of the organizational provider. The application must be completed in its entirety. The organizational provider must attest that their application is complete and correct within

180 calendar days of the decision to approve or deny participation in the North Sound BH-ASO network. The application must be completed in typewritten text or in legible non-erasable pen. Pencils or erasable ink will not be an acceptable writing instrument for completing applications. North Sound BH-ASO will accept faxed, digital, electronic, scanned or photocopied signatures. A signature stamp is not acceptable on the attestation.

## **VI. The Process for Making Decisions**

All organizational providers requesting participation with North Sound BH-ASO must complete an application. To be eligible to submit an application the organizational provider must meet all the criteria outlined above in the section titled "Criteria for Participation in the North Sound BH-ASO Network". Organizational providers requesting initial participation may not provide care to North Sound BH-ASO Members until the credentialing process is complete and the final decision has been rendered.

North Sound BH-ASO completes a reassessment of its contracted organizational providers at least every 36 months. Approximately 6 months prior to the assessment due date, a request will be sent to the organizational provider requesting completion of an application.

During the initial and reassessment application process, the organizational provider must:

- a. Submit a completed application within the requested timeframe
- b. Attest to the application within the last 180 calendar days
- c. Provide North Sound BH-ASO adequate information to prove they meet all criteria for initial participation or continued participation in the North Sound BH-ASO network

Once the application is received, North Sound BH-ASO will complete all the verifications as outlined above. In order for the application to be deemed complete, the organizational provider must produce adequate information to prove they meet all criteria for initial participation or continued participation in the North Sound BH-ASO network. All fields within the application must be completed, all required attachments must be included, detailed explanations must be provided where the application indicates necessary and any additional information requested by North Sound BH-ASO must be provided.

If the organizational provider does not provide the information necessary to complete the application process in the time period requested, the application will be deemed incomplete and North Sound BH-ASO will discontinue processing of the application. This will result in an administrative hold, denial or termination from the North Sound BH-ASO network.

At the completion of the application and primary source verification process, each file is quality reviewed to ensure completeness. Once the quality review process is complete, each file will be submitted to the Credentialing Committee to seek a vote of approval. The Credentialing Committee has the ability to render a decision of Pending Approval or Final Approval. Pending Approval does not deem the provider organization full approval and requires further action to be taken. A Pending Approval decision has the opportunity to be deemed Final Approval with the satisfaction of outstanding items.

## **VII. Credentialing Committee Review Guidelines:**

- a. **Final Approval**

- I. Organizational provider meets all criteria for participation as outlined in the section titled Criteria for Participation in the North Sound BH-ASO Network.
- II. At reassessment, organizational provider's record has not changed since the last assessment cycle and everything was previously reviewed and determined acceptable by the Credentialing Committee.

**b. Pending Approval**

1. The state license(s), certification(s) and or registration(s) has any restrictions, limitations, conditions or sanctions (formal or informal) currently open<sup>1</sup>, pending investigations or occurring within the past 10-years.
2. The organizational provider currently has or has ever had any of the following sanctions imposed by Medicare, Medicaid, accrediting agencies or other state and federal agencies:
  - i. Stop placement status
  - ii. Denial of payment status
  - iii. Temporary management status
  - iv. Pending state charges, actions
  - v. Excluded or expelled status
  - vi. Loss of accreditation, licensure or certification status
3. Organizational provider is currently pending corrective action for an inspection conducted by CMS or applicable state agency.
4. Organizational provider has ever had any legal actions excluding medical malpractice.
5. Organizational provider has ever been convicted of a crime, excluding misdemeanors.
6. Any governmental agency ever investigated, suspended, revoked, or taken any other action against organizational provider's license to conduct business.
7. Organizational provider has ever been assessed a penalty, conviction or suspension by the Medicare or Medicaid programs or is currently under investigation.
8. Any individually licensed, certified or registered practitioners employed by the organizational provider has ever been convicted of a crime, excluding misdemeanors.
9. A third-party payer has ever revoked, reduced, denied or suspended organizational provider's participation due to inappropriate utilization management or any other quality of care issues.
10. Any managing employee or person with an ownership or control interest has ever been or is currently excluded from participation in a government program (e.g., Medicare/Medicaid).
11. Organizational provider does not meet the minimum insurance limits and/or coverage requirements as listed in Addendum A.
12. Organizational provider has ever been involved in acts of dishonesty, fraud, deceit or misrepresentation that relate to or impact or could relate to or impact the organizational provider's professional conduct of the health, safety or welfare of North Sound BH-ASO/MCO members.

---

<sup>1</sup> If a provider's application is denied solely because a provider has a pending Statement of Charges, Notice of Proposed Disciplinary Action, Notice of Agency Action or the equivalent from any state or governmental professional disciplinary body, the provider may reapply as soon as provider is able to demonstrate that any pending Statement of Charges, Notice of Proposed Disciplinary Action, Notice of Agency Action, or the equivalent from any state or governmental professional disciplinary body is resolved, even if the application is received less than one year from the date of original denial.

13. Organizational provider engages or has ever engaged in acts, which North Sound BH-ASO, in its sole discretion, deems inappropriate.
14. Organizational provider has a pattern of member complaints or grievances in which there appears to be a concern regarding the quality of service provided to North Sound BH-ASO/MCO members.
15. Organizational provider has not complied with North Sound BH-ASO's quality assurance program.
16. Organizational provider is found to have rendered a pattern of substandard care or is responsible for any gross or flagrant incident of substandard care.
17. Organizational provider has displayed inappropriate patterns of referral, which deviate substantially from reasonably expected patterns of referral.
18. Organizational provider makes any material misrepresentation or omission to North Sound BH-ASO concerning licensure, registration, accreditation, insurance, certification, disciplinary history or any other material matter covered in the application or related materials.

At each Credentialing Committee meeting, organizational provider files are reviewed by the Credentialing Committee. All of the issues are presented to the Credentialing Committee members and then open discussion of the issues commences. After the discussion, the Credentialing Committee votes for a final recommendation. The Credentialing Committee can recommend final approval, pending approval, deny, terminate, place on corrective action or defer their decision pending additional information. The North Sound BH-ASO Medical Director has the authority to make the determination regarding participation in the North Sound BH-ASO network. In the absence of the Medical Director, a Credentialing Committee designee has the authority to make the determination. When justifiable circumstances exist, organizational providers who do not meet certain criteria may be approved. The Credentialing Committee must explicitly review and recommend approval of any exceptions. Each exception is specific to the situation for which the exception is made and is not intended to establish a precedent for any future Credentialing Committee recommendations.

#### **VIII. Process Used for Managing Assessment Files that Meet Criteria**

The Medical Director, or designee, responsible for credentialing has the authority to approve organizational providers with clean files recommended for Final Approval. The Medical Director, or designee, reviews each file deemed for Final Approval. Once the Medical Director, or designee, makes the determination to approve the organizational providers seeking Final Approval, they/their designee signs and dates the approval form. This sign-off date is considered the decision date. The Medical Director, or designee, can request to have any organizational provider's file reviewed at the next scheduled Credentialing Committee meeting. When this occurs, the organizational provider will not be considered approved until Credentialing Committee reviews and makes a determination.

#### **IX. Timeliness of Verifications**

Many credentialing elements have time-sensitive factors that are identified within the table located in the section of this policy titled 'Criteria for Participation in the North Sound BH-ASO Network'. North Sound BH-ASO is responsible for ensuring and documenting that none of the time-sensitive credentialing factors are more than 180 calendar days old at the time of the credentialing decision. When assessing performance against timeliness requirements, North Sound BH-ASO counts backward from the date of the Credentialing Committee's decision or Medical Director's approval. North Sound BH-ASO does not count forward from the date on which the credentialing application was received or



from the date of verification of a specific credential. Credentials must be verified within the specified time limits and be valid at the time of the Credentialing Committee's or Medical Director's review and approval. The organizational provider may not provide care to Members until the credentialing process is completed and the final decision is rendered.

#### **X. Provisional Credentialing**

It can occasionally be in the best interest of attributed members to make organizational providers available prior to completion of the entire initial credentialing process. In this case, if allowable by the state regulatory agency, North Sound BH-ASO may complete provisional credentialing only for providers applying for credentialing the first time (for example for a newly licensed organizational that has not yet had a CMS/State survey or an accreditation survey). An organizational provider can only be provisionally credentialed once, and the provider may not be held in a provisional status for more than sixty (60) calendar days.

At a minimum, North Sound BH-ASO requires the following to be completed prior to approval of provisional credentialing:

- a. A complete, signed, and dated credentialing application;
- b. A current attestation within 180 calendar days;
- c. Primary-source verification of a current, valid license to operate in the state;
- d. Current professional liability insurance showing dates and amounts of coverage; and
- e. Primary source verification of any sanctions/exclusions imposed by Medicare, Medicaid, accrediting agencies or other state and federal agencies. Organizational provider must not have any sanctions/exclusions imposed to be provisionally credentialed.
- f. Primary source verification of the past five (5) years of malpractice claims or settlements from the malpractice carrier or the results of the National Practitioner Databank query if indicated;

Each of these elements must be primary-source verified within 180 calendar days of the provisional credentialing decision. North Sound BH-ASO follows the same process for presenting provisional credentialing files to the Credentialing Committee or Medical Director as it does for the regular credentialing process.

#### **XI. Notification of Discrepancies in Credentialing Information**

North Sound BH-ASO will notify the organizational provider immediately in writing if credentialing information obtained from other sources varies substantially from that provided by the organizational provider. Examples include but are not limited to actions on a license, sanctions or loss of accreditation status. North Sound BH-ASO is not required to reveal the source of information if the information is not obtained to meet organization credentialing verification requirements or if disclosure is prohibited by Law. Please also refer to the section below titled "Organizational Provider's Rights to Correct Erroneous Information".

The Contractor's credentialing and recredentialing process for a decision within sixty (60) calendar days of the submission of the credentialing application when the Provider application is complete upon submission.

#### **XII. Notification of Credentialing Decisions**

A letter is sent to every organizational provider with notification of the Credentialing Committee or Medical Director's decision regarding their participation in the North Sound BH-ASO network. This notification is sent within 3 weeks of the decision. Copies of the letters are filed in the organizational

provider's credentials files. Under no circumstance will notifications letters be sent to the organizational provider later than 15 business days from the decision.

### **XIII. Organizational Provider Rights to Correct Erroneous Information**

Organizational providers have the right to correct erroneous information in their credentials file. Organizational providers are notified of their right in a letter sent to them at the time the initial or recredentialing application is received.

North Sound BH-ASO will notify the organizational provider immediately in writing if credentialing information obtained from other sources varies substantially from that provided by the organizational provider. Examples include but are not limited to actions on a license or loss of accreditation status. North Sound BH-ASO is not required to reveal the source of information if the information is not obtained to meet organization credentialing verification requirements or if disclosure is prohibited by law.

The notification sent to the organizational provider will detail the information in question and will include instructions to the organizational provider indicating:

Their requirement to submit a written response within 10 calendar days of receiving notification from North Sound BH-ASO.

In their response, the organizational provider must explain the discrepancy, may correct any erroneous information, and may provide available proof.

The organizational provider's response must be sent to North Sound BH-ASO. Attention: Credentialing Committee at 2021 E. College Way, Ste.101, Mount Vernon, WA 98273.

Upon receipt of notification from the organizational provider, North Sound BH-ASO will document receipt of the information in the organizational provider's credentials file. North Sound BH-ASO will then re-verify the primary source information in dispute. If the primary source information has changed, correction will be made immediately to the organizational provider's credentials file. The organizational provider will be notified in writing that the correction has been made to their credentials file. If the primary source information remains inconsistent with the organizational providers', the Credentialing Committee will notify the organizational provider. The organizational provider may then provide proof of correction by the primary source body to North Sound BH-ASO's Credentialing Committee. The Credentialing Committee will re-verify primary source information if such documentation is provided.

If the organizational provider does not respond within 10 calendar days, their application processing will be discontinued, and network participation will be administratively denied or terminated.

### **XIV. Organizational Provider Right to be Informed of Application Status**

Organizational providers have a right, upon request, to be informed of the status of their application. Organizational providers applying for initial participation are sent a letter when their application is received by North Sound BH-ASO and are notified of their right to be informed of the status of their application in this letter. Organizational providers are also notified of their right in the North Sound BH-ASO Supplemental Provider Service Guide sent to them at the time of initial contracting.

The organizational provider can request to be informed of the status of their application by telephone, email or mail. North Sound BH-ASO will respond to the request within two (2) working days. North Sound BH-ASO may share with the organizational provider where the application is in the credentialing process to include any missing information or information not yet verified.

**XV. Change of Ownership**

All Organizational Provider Types (excluding hospitals):

If a participating organizational provider is sold (or leased) resulting in a change of ownership between credentialing cycles, the organizational provider will be initially credentialed.

**XVI. Ongoing Monitoring of Sanctions**

North Sound BH-ASO monitors providers between assessment cycles and takes appropriate action against providers when occurrences of poor quality are identified.

**a. Medicare and Medicaid sanctions**

The United States Department of Health & Human Services (HHS), Office of Inspector General (OIG) Fraud Prevention and Detection Exclusions Program releases a report every month of individuals and entities that have been excluded from Medicare and Medicaid programs. Within 30 calendar days of its release, a report is run to identify any potential matches between sanctioned providers and North Sound BH-ASO providers and/or individuals with ownership and/or a controlling interest in the organizational provider. The Credentialing Committee reviews the report of potential matches and completes the research to determine if there is indeed an exact match. If the Credentialing Committee identifies a North Sound BH-ASO provider or an individual with ownership and/or a controlling interest in the organizational provider on the OIG exclusion report, the Credentialing Committee notifies the Contracts, Utilization Management, Compliance and the Internal Quality Management Committee. North Sound BH-ASO immediately terminates the provider's contract effective the same date the sanction was implemented and sends an email notification to the Credentialing Committee confirming the termination was completed. Contracts ensures no claims will be paid to this provider and no authorization can be generated to this provider. The Credentialing Committee maintains a log which indicates the date each OIG report was released, the date the report was reviewed by North Sound BH-ASO staff and indicating if there were any matches found between the OIG report and North Sound BH-ASO's provider network.

North Sound BH-ASO also monitors for state Medicaid exclusions through each state's specific Program Integrity Unit (or equivalent). North Sound BH-ASO queries every provider in the North Sound BH-ASO provider network against each state's published report within 30 calendar days of its release. The Credentialing Committee reviews any potential matches and completes the research to determine if there is indeed an exact match. If the Credentialing Committee identifies a North Sound BH-ASO provider on the report, the Credentialing Committee notifies the following North Sound BH-ASO departments: Fiscal, Contracting, Utilization Management, Compliance and the Internal Quality Management Committee. North Sound BH-ASO immediately terminates the provider's contract effective the same date the sanction was implemented and sends an email notification to the Credentialing Committee confirming the termination was completed. If a provider is found to be sanctioned/excluded/terminated from any state's Medicaid program, the provider will be terminated with North Sound BH-ASO and for every line of business. The Information System/Fiscal Department ensures no claims will ever pay to this provider and no

authorization can ever be generated to this provider. The Credentialing Committee maintains a log which indicates the date each Medicaid exclusions report was released, the date the report was reviewed by North Sound BH-ASO staff and indicating if there were any matches found between the OIG report and North Sound BH-ASO's provider network.

**b. System for Award Management (SAM)**

North Sound BH-ASO monitors the SAM once per month to ensure providers and/or individuals with ownership and/or a controlling interest in the organizational provider have not been sanctioned. If the Credentialing Department identifies a North Sound BH-ASO provider or an individual with ownership and/or a controlling interest in the organizational provider on SAM, the Credentialing Committee notifies the Contracts, Information Systems/Fiscal, Utilization Management, Compliance and the Internal Quality Management Committee. North Sound BH-ASO immediately terminates the provider's contract effective the same date the sanction was implemented and sends an email notification to the Credentialing Committee confirming the termination was completed. The Provider Information Systems/Fiscal Department ensures no claims will pay to this provider and no authorization can be generated to this provider. The Credentialing Committee maintains a log which indicates the date each SAM check was completed and indicating if there were any matches found.

**c. Member Complaints/Grievances**

North Sound BH-ASO has a process in place to investigate provider-specific grievances from members upon their receipt. North Sound BH-ASO evaluates both the specific grievance and the provider's history of issues, if applicable. The history of grievances is evaluated for all providers at least every six (6) months.

**d. Adverse Events**

North Sound BH-ASO has a process in place for monitoring adverse events at least every six (6) months. An adverse event is an injury that occurs while a member is receiving behavioral health care services from a provider.

**XVII. Range of Actions**

The North Sound BH-ASO Credentialing Committee can take one of the following actions against organizational providers who fail to meet standards or who fail to meet performance expectations:

- a. Monitor on a Watch Status
- b. Require formal corrective action
- c. Deny of network participation
- d. Terminate from network participation
- e. In cases where the Medical Director determines the circumstances pose an immediate risk to attributed members, an organizational provider may be summarily suspended from participation in the network, without prior notice, pending review and investigation of information relevant to the case.

This applies to all organizational providers who are contracted by North Sound BH-ASO. These actions do not apply to applicants who do not meet basic conditions of participation and are ineligible for participation. The purpose of this policy is to provide a mechanism for implementation of monitoring on watch status, requiring formal corrective action, suspension or termination of North Sound BH-ASO providers. If at any point, an organizational provider fails to meet the minimum standards and criteria or fails to meet performance expectations regarding quality of care the Credentialing Committee may

act to implement one of these actions. Termination may be taken after reasonable effort has been made to obtain all the facts of the matter.

**a. Criteria for Denial or Termination Decisions by the Credentialing Committee;**

The criteria used by the Credentialing Committee to decide to deny or terminate an organizational provider from the North Sound BH-ASO network include, but are not limited to, the following:

1. The organizational provider's state license(s), certification(s) and or registration(s) has any restrictions, limitations, conditions or sanctions (formal or informal) currently open<sup>2</sup>, pending investigations or occurring within the past 10-years.
2. The organizational provider currently has or has ever had any of the following sanctions imposed by Medicare, Medicaid, accrediting agencies or other state and federal agencies:
  - i. Stop placement status
  - ii. Denial of payment status
  - iii. Temporary management status
  - iv. Pending state charges, actions
  - v. Excluded or expelled status
  - vi. Loss of accreditation, licensure or certification status
3. Organizational provider is currently pending corrective action for an inspection conducted by CMS or applicable state agency.
4. Organizational provider has ever had any legal actions excluding medical malpractice.
5. Organizational provider has ever been convicted of a crime, excluding misdemeanors.
6. Any governmental agency ever investigated, suspended, revoked, or taken any other action against organizational provider's license to conduct business.
7. Organizational provider has ever been assessed a penalty, conviction or suspension by the Medicare or Medicaid programs or is currently under investigation.
8. Any individually licensed, certified or registered practitioners employed by the organizational provider has ever been convicted of a crime, excluding misdemeanors.
9. A third-party payer has ever revoked, reduced, denied or suspended organizational provider's participation due to inappropriate utilization management or any other quality of care issues.
10. Any managing employee or person with an ownership or control interest has ever been or is currently excluded from participation in a government program (e.g., Medicare/Medicaid).
11. Organizational provider does not meet the minimum insurance limits and/or coverage requirements as listed in Addendum A or B.
12. Organizational provider has ever been involved in acts of dishonesty, fraud, deceit or misrepresentation that relate to or impact or could relate to or impact the organizational provider's professional conduct or the health, safety or welfare of North Sound BH-ASO members.

---

<sup>2</sup> If an organizational provider's application is denied solely because a provider has a pending Statement of Charges, Notice of Proposed Disciplinary Action, Notice of Agency Action or the equivalent from any state or governmental professional disciplinary body, the provider may reapply as soon as provider is able to demonstrate that any pending Statement of Charges, Notice of Proposed Disciplinary Action, Notice of Agency Action, or the equivalent from any state or governmental professional disciplinary body is resolved, even if the application is received less than one year from the date of original denial.

13. Organizational provider engages or has ever engaged in acts, which North Sound BH-ASO, in its sole discretion, deems inappropriate.

**b. Monitoring on a Committee Watch Status**

North Sound BH-ASO uses the category “watch status” for providers whose initial or continued participation is approved by the Credentialing Committee with follow-up to occur. The Credentialing Committee may approve a provider to be monitored on watch status when there are unresolved issues or when the Credentialing Committee determines that the provider needs to be monitored for any reason.

When a provider is approved on watch status, the Credentialing Committee conducts the follow-up. Any unusual findings are reported immediately to the North Sound BH-ASO Medical Director to determine if immediate action is necessary. Every unusual finding is reviewed in detail at the next Credentialing Committee meeting for review and determination.

The “watch status” may also be used for up to 12 months to allow for a credentialing to be approved in cases where a provider has not had a timely CMS/State survey or an accreditation survey due to circumstances beyond the control of the Provider (such as delays in surveys due to a Public Health issue). In such cases the Committee should review the prior available survey (and associated corrective processes) to ensure there are no major potential disqualifying issues.

**c. Corrective Action**

In cases where altering the conditions of participation is based on issues related to quality of care and/or service, North Sound BH-ASO may work with the provider to establish a formal corrective action plan to improve performance, prior to, or in lieu of suspending or terminating their participation status.

A corrective action plan is a written improvement plan, which may include, but is not limited to the following:

1. Identifying the performance issues that do not meet expectations;
2. What actions/processes will be implemented for correction;
3. Who is responsible for the corrective action;
4. What improvement/resolution is expected;
5. How improvements will be assessed;
6. Scheduled follow-up, monitoring (compliance review, normally not to exceed six (6) months).

Within 10 calendar days of the Credentialing Committee’s decision to place provider on a corrective action plan, the provider will be notified via a certified letter from the Medical Director, or designee. Such notification will outline:

1. The reason for the corrective action; and
2. The corrective action plan.

If the corrective actions are resolved, the provider’s performance may or may not be monitored, as deemed appropriate. If the corrective action(s) are not adequately resolved within the designated time, depending on the circumstances of the case, the Credentialing Committee may recommend that the provider continue on an improvement plan, or recommend suspension or

termination. All recommendations for termination that result from a lack of appropriate provider response to corrective action will be brought to the Credentialing Committee for review and recommendation.

**d. Summary Suspension**

In cases where the Medical Director becomes aware of circumstances that pose an immediate risk to individuals, a meeting will be held immediately with the Medical Director, the Credentialing Committee and when required North Sound BH-ASO legal Counsel. After discussing the facts, the provider may be summarily suspended from participation in the network, without prior notice, pending review and investigation of information relevant to the case.

Such summary suspension shall become effective immediately upon imposition, and the Medical Director/Designee shall promptly notify the provider of the suspension, via a certified letter. Notification will include the following:

1. A description of the action being taken
2. Effective date of the action
3. The reason(s) for the action and/or information being investigated
4. Information (if any) required from the provider
5. The length of the suspension
6. The estimated timeline for determining whether to reinstate or terminate the provider

Upon initiation of the suspension, the Medical Director and credentialing staff will commence investigation of the issues. Findings of the investigation will be presented to the Credentialing Committee. The Credentialing Committee has the authority to implement corrective action, place conditions on the provider's continued participation, discontinue the suspension or terminate the provider.

**e. Termination**

After review of appropriate information, the Credentialing Committee may determine that the provider does not meet performance expectations pertaining to quality of care, services or established performance/professional standards. The Credentialing Committee may then recommend terminating the provider.

If the provider is terminated, within 10 calendar days of the Committee's recommendation, the provider is sent a written notice of North Sound BH-ASO's intent to terminate them from the network, via certified mail from the Medical Director, or designee, which includes the following:

1. A description of the action being taken
2. Reason for termination

The action is reported to North Sound BH-ASO Contracts within 15-calendar days of the effective date of the action. Contracts is then responsible for notifying state agencies as required in the contracts between North Sound BH-ASO and the state entities.

**XVIII. Designated Crisis Responder (DCR)**

Within the North Sound BH-ASO, the Credentialing Committee oversees approvals of DCR appointments.

1. North Sound BH-ASO will maintain and make available to affiliated agencies a DCR appointment request form that obtains information about all required demographic data, service locations and training. This form will be completed and, along with evidence of applicable licensure, training, and experience, is submitted to the North Sound BH-ASO Clinical Director when that agency seeks the appointment of a new DCR.
2. After receiving the above, the information is reviewed by the North Sound BH-ASO Clinical Director within 30 days.
3. Based on this review, the Clinical Director verifies eligibility based on information provided. This verification is provided to the Credentialing Committee for their affirmation.
4. a) If the Clinical Director is unable to reach a decision or determines that the individual does not meet criteria for approval, the affiliated agency will be notified and provided an opportunity to either correct the submission or withdraw it. Each designee and the affiliated agency will receive a written letter of designation upon completion of document review and Committee affirmation.

**Related Policies:** 1026.00 – Organizational Provider Credentialing

**ATTACHMENTS**

None

**Addendum A – North Sound BH-ASO LLC. Organizational Provider Requirements for Professional Liability Insurance Coverage**

<b>Organizational Providers categories outlined under section ‘Type of Organizational Providers Assessed’</b>	<b>Professional Liability Insurance Requirements</b>
<b>a. Agencies</b>	Required if they have licensed professional employees, \$1million/\$2million
<b>b. Ambulatory Health Care Facilities</b>	Required if they have licensed professional employees, \$1million/\$3million
<b>c. Atypical Providers</b>	None
<b>d. Residential Treatment Facilities</b>	\$1million/\$3million