

n05567

## Recredentials Information Collection, Coordination and Dissemination

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### *Values*

Accountability • Integrity • Service Excellence • Innovation • Collaboration

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#### **Abstract Purpose:**

The purpose of this policy is to provide guidance to the Network Health Plan/Network Health Insurance Corporation/Network Health Administrative Services, LLC (NHP/NHIC/NHAS) Credentialing Department in fulfilling its responsibilities for collecting reappointment credentials for all licensed independent practitioners, dependent practitioners, and organizational providers.

#### **Policy Detail:**

- I. The NHP/NHIC/NHAS Credentialing Department formally conducts data collection and primary source verification for reappointment of all NHP/NHIC/NHAS licensed independent practitioners, dependent practitioners, and organizational provider practitioners at least every three years. The NHP/NHIC/NHAS Credentialing Department reverifies the credentialing information that is subject to change over time. Static historical elements such as medical education and training do not need to be reverified.
- II. The NHP/NHIC/NHAS Credentialing Department will forward a reappointment application packet to the reappointee at least 120 days before the expiration of Network Health Plan participation. The application packet will include:
  - A. Reappointment Application form
  - B. Criminal Background Check Form
- III. The reappointee must sign the reappointment application via handwritten or electronic documentation. Electronic signatures must be generated from a secure site. Handwritten signatures will be recorded in black or blue non-erasable, non-water-soluble ink. Felt tip markers, fountain pens and signature stamps may not be used and in so doing:
  - A. Signifies a willingness to appear for interviews in regard to the application.
  - B. Authorizes NHP/NHIC/NHAS representatives to consult with others who have been associated with the reappointee and/or have information bearing on his or her competence and qualifications.

- C. Consents to NHP/NHIC/NHAS representatives' inspection of all records and documents that may be material to an evaluation of the reappointee's:
  - 1. Professional qualifications and competence
  - 2. Physical and mental health status
  - 3. Professional and ethical qualifications.
- D. Releases from any liability all NHP/NHIC/NHAS representatives for their acts performed in connection with evaluation of reappointment credentials and qualifications.
- E. Releases from any liability all individuals and organizations who in good faith and without malice provide information to NHP/NHIC/NHAS representatives - including otherwise privileged or confidential information - concerning the reappointee's competence, professional ethics, character, physical and mental health, emotional stability and other qualifications for Network Health Plan participation as applicable.
- F. Authorizes and consents to NHP/NHIC/NHAS representatives providing other hospitals, medical associations, licensing boards, and any organizations concerned with all licensed independent practitioners, dependent practitioners and organizational provider's performance and the quality and efficiency of patient care with any relevant information that the organization may have, and releases NHP/NHIC/NHAS representatives from liability for so doing.
- G. Understands and agrees that credentialing and peer review information related to their professional qualifications, character and competence will be released and exchanged among NHP/NHIC/NHAS entities.
- H. Expressly authorizes the sharing of such information within NHP/NHIC/NHAS, both with respect to information that exists today, and information obtained or created in the future (until such time as all licensed independent practitioners, dependent practitioners and organizational provider practitioners revoke this consent).
- I. Signifies that the reappointee agrees to be bound by the current NHP/NHIC/NHAS policies and procedures, in regard to the application for reappointment for Network Health Plan participation.
- J. Attests to the correctness and completion of the reappointment application form.
- K. The reappointee must submit the following to the NHP Credentialing Department via email, fax, or mail:
  - 1. A complete reappointment application form. Reappointment application will be deemed incomplete if information or documentation requested not provided, if responses provided require further explanation, if details related to affirmative responses to disclosure questions are not provided, or if any document has expired prior to making the decision to accept or not to accept the reappointee.
  - 2. A signed and dated release/attestation form. Reappointment application is incomplete without signature and date.
  - 3. If available, a copy of the letter or certificate from the appropriate American Board of Medical Specialties specialty boards documenting change in board status - certified, recertified, or eligible, if applicable.

4. Copy of Federal DEA registration or CDS (Controlled Dangerous Substances) certificate in each state, which is current and effective, if reappointee is to prescribe narcotics.
  5. Information on hospital affiliations and health status.
  6. Copy of face sheet of current and valid professional liability insurance in which coverage pertains to area of practice or profession and meets the minimum limit requirement and completion of malpractice history questions on reappointment application form.
    - ii. For practitioners with federal tort coverage, the practitioner need not contain the current amount of malpractice insurance coverage. Practitioner may include a copy of the federal tort letter or an attestation from the practitioner of federal tort coverage and completion of the malpractice history questions on the application form.
  7. Criminal Background Check Form.
- IV. All reappointment files, reports, and any other material shall be treated in a confidential manner at all times and stored on a secure electronic site. Disclosure of such information shall be limited to NHP/NHIC/NHAS. All other requests will require a consent for release of information by the reappointee. Upon receipt of any documents, the Credentialing staff will date stamp and initial any items when they are received.
- V. All credentialing information is received either by email, fax or paper copy through the US mail and all credential files, minutes, reports and any other material used to determine a credentialing decision is confidential and scanned stored in a secure electronic site in the credentialing department. Disclosure of such information will be not be granted unless consent for release of information has been signed by the reappointee. All materials/primary source verifications are performed and reviewed by the credentialing staff for appropriateness and processing per primary source guidelines. Upon receipt of any documents, the Credentialing staff will date stamp with an electronic stamp and initial all items as they are received. All information added to the ECHO Credentialing software/provider file is reviewed and signed off on by another credentialing coordinator for accuracy before the file may progress.
- VI. Verification Process: Primary verification is obtained from the following:

Criteria for Verification	Source	Provider type	Time	When required
<p><b><u>Application</u></b>  Practitioner must submit a complete credentialing application, typewritten or completed in non-erasable ink. Application must include all required attachments. The attestation and release must be signed and dated by the practitioner. Signature stamps are not acceptable. Must show absence of history of any professional disciplinary action or sanctions by federal, state and local authorities, including each jurisdiction in which the practitioner practices or previously practiced, to include, but not limited to:</p> <ul style="list-style-type: none"> <li>• Being placed on probation, reprimanded, fined or having medical practice restricted by any agency that disciplines practitioners</li> <li>• Medicare or Medicaid reprimand, censure, disqualification, suspension, conviction or indictment for a felony in the case of such history</li> <li>• must show evidence that this history does not demonstrate probable future substandard professional performance or probable future unacceptable business practices</li> </ul>	<ul style="list-style-type: none"> <li>• Every section of the application is complete or designated N/A</li> <li>• Every question is answered, and answers are legible.</li> <li>• The attestation is signed and dated by the practitioner</li> <li>• All required attachments are present</li> <li>• A detailed written response is included for every yes answer on the professional questions</li> </ul>	All Credentialed practitioners	180 Calendar Days	Initial & Recredentialing

All practitioners must demonstrate appropriate office and medical recordkeeping standards acceptable to Network Health Plan/Network Health Insurance Corporation or must show evidence of compliance to action plan to improve office sites and/or medical/treatment recordkeeping practices and to ultimately meet the standards should there be a complaint filed. Practitioners must show absence of a chemical dependency or substance abuse problem that might adversely affect practitioner's ability to competently and safely perform the essential functions of a practitioner in the same area of practice and applicant shows absence of physical or mental condition that may impair the practitioner's ability to practice within the full scope of licensure and qualifications or may pose a risk of harm to patients.

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<p><b><u>Malpractice Insurance</u></b>  Practitioner must have and maintain professional malpractice liability insurance with limits that meet NHP criteria.  For practitioners with federal tort coverage, the application does need to contain the current amount of malpractice insurance coverage.  Practitioner files that include a copy of the federal tort letter or an attestation from the practitioner of federal tort coverage will be included in the practitioners file.</p>	<p>A copy of the insurance certificate showing:</p> <ul style="list-style-type: none"> <li>• The type of coverage is professional liability insurance</li> <li>• Dates of coverage (must be currently in effect)</li> <li>• Amounts of coverage</li> <li>• Either the specific practitioner name or the name of the group in which the practitioner works</li> </ul>	<p>All practitioner types</p>	<p>Must be in effect at the time of decision and verified within 180 Calendar Days</p>	<p>Initial &amp; Recredentialing</p>
<p><b><u>License</u></b>  Practitioner must have and maintain professional malpractice liability insurance with limits that meet NHP and the WI Department of Licensing criteria.</p>	<p>Current, valid licensure is verified directly with the appropriate state licensing or certification agency.</p> <ul style="list-style-type: none"> <li>• On-line directly with Licensing Board or appropriate state agency</li> </ul> <p>The verification must indicate:</p> <ul style="list-style-type: none"> <li>• the scope/type of license</li> <li>• the date of original licensure</li> <li>• expiration date</li> <li>• status of license</li> <li>• If there have been or currently are any disciplinary action or sanctions on the license.</li> </ul>	<p>All practitioner types</p>	<p>Must be in effect at the time of decision and verified within 180 Calendar Days</p>	<p>Initial &amp; Recredentialing</p>

<p><b><u>DEA/CDS</u></b>  Practitioner must hold a current, valid, unrestricted Drug Enforcement Agency (DEA). Practitioner must have a DEA in every state where the practitioner provides care to NHP members. If provider doesn't have a DEA, a coverage arrangement will be documented.</p>	<p>Online using the DEA Diversion site:  <a href="https://apps.deadiversion.usdoj.gov/webforms/validateLogin.jsp">https://apps.deadiversion.usdoj.gov/webforms/validateLogin.jsp</a></p>	<p>All practitioner types that have DEA</p>	<p>Must be in effect at time of decision and verified within 180 calendar days</p>	<p>Initial &amp; Recredentialing</p>
<p><b><u>Education</u></b>  Practitioner must have graduated from an accredited school with a degree required to practice in their specialty.</p>	<p>The highest level of education is primary source verified by one of the following methods:</p> <ul style="list-style-type: none"> <li>• Primary source verification of Board Certification by accessing the ABMS website. This verification must indicate the education has been specifically verified.</li> <li>• The American Medical Association (AMA) Physician Master File. This verification must indicate the education has specifically been verified.</li> <li>• The American Osteopathic Association (AOA) Official Osteopathic Physician Profile Report or AOA Physician Master File. This verification must indicate the education has specifically been verified.</li> </ul>	<p>All practitioner types</p>	<p>Must be verified within 180 calendar days.</p>	<p>Initial</p>

	<ul style="list-style-type: none"> <li>• Confirmation directly from the accredited school. This verification must include the type of education, the date started, date completed and if the practitioner graduated from the program.</li> <li>• Educational Commission for Foreign Medical Graduates (ECFMG) for international medical graduates licensed after</li> <li>• Student Clearinghouse</li> </ul>			
<p><b><u>Residency Training</u></b> Practitioner must have satisfactorily completed a residency program from a training program accredited by The Accreditation Council for Graduate Medical Education (ACGME) in the specialty in which they are practicing. Verification of the residency is always required as described in the Board Certification section below.</p>	<p>Residency Training is primary source verified by one of the following methods:</p> <ul style="list-style-type: none"> <li>• Primary source verification of Board Certification in the same specialty of the Residency Training program (as outlined in the Board Certification section).</li> <li>• The American Medical Association (AMA) Physician Master File. This verification must indicate the training has specifically been verified.</li> <li>• The American Osteopathic Association (AOA) Official Osteopathic Physician Profile</li> </ul>	MD's, DO's, DPM's, Oral Surgeons, DDS (if applicable)	Must be verified within 180 calendar days.	Initial



	<p>Report or AOA Physician Master File. This verification must indicate the training has specifically been verified.</p> <ul style="list-style-type: none"> <li>• Confirmation directly from the accredited training program. This verification must include the type of training program, specialty of training, the date started, date completed and if the program was successfully completed.</li> <li>• For Closed Residency Programs, residency completion can be verified through the Federation of State Medical Boards Federation Credentials Verification Service (FCVS).</li> </ul>			
<p><b><u>Fellowship Training</u></b></p> <p>If the practitioner has not completed a Residency program in the specialty in which they are practicing, they must have completed a fellowship program in the specialty in which they are practicing.</p>	<p>Fellowship Training is primary source verified by one of the following methods:</p> <ul style="list-style-type: none"> <li>• Primary source verification of Board Certification in the same specialty of the Fellowship Training program (as outlined in the Board Certification section of this policy).</li> <li>• The American Medical Association (AMA) Physician Master File. This</li> </ul>	MD's, DO's, DPM's	Must be verified within 180 calendar days.	Initial

	<p>verification must indicate the training has specifically been verified.</p> <ul style="list-style-type: none"> <li>• The American Osteopathic Association (AOA) Official Osteopathic Physician Profile Report or AOA Physician Master File. This verification must</li> <li>• indicate the training has specifically been verified.</li> <li>• Confirmation directly from the accredited training program. This verification must include the type of training program, specialty of training, the date started, date completed and if the program was successfully completed.</li> </ul>			
<p><b><u>Board Certification</u></b> Board certification in the specialty in which the practitioner is practicing is preferred. Initial applicants who are not Board Certified may be considered for participation if they demonstrate they have equivalent training and competence in their specialty or is an Essential Community Provider (ECP) as defined by Network Health. NHP recognizes Board Certification only from the following Boards:</p> <ul style="list-style-type: none"> <li>• American Board of Medical Specialties (ABMS)</li> </ul>	<p>Board Certification is primary source verified through one of the following:</p> <ul style="list-style-type: none"> <li>• ABMS display agent, where a dated certificate of primary-source authenticity has been provided (as applicable)</li> <li>• AMA Physician Master File profile (as applicable)</li> <li>• AOA Official Osteopathic Physician Profile Report or AOA Physician Master File (as applicable).</li> <li>• Confirmation directly from the board. This</li> </ul>	MD's, DO's, DPM's, APNP's, PA's, DDS (if applicable)	Must be verified within 180 calendar days.	Initial & Recredentialing

<ul style="list-style-type: none"> <li>• American Osteopathic Association (AOA)</li> <li>• American Board of Podiatric Medicine</li> <li>• American Board of Foot &amp; Ankle Surgery</li> <li>• National Certification Commission for Physician Assistants</li> <li>• American Academy of Nurse Practitioners</li> <li>• American Nurse Credentialing Center</li> <li>• Applicable Dental Specialty Certifying Board</li> <li>• American College of Nurse Midwives</li> </ul>	<p>verification must include the specialty of the certification(s), the original certification date, and the expiration date.</p> <ul style="list-style-type: none"> <li>• On-line from the American Board of Podiatric Medicine</li> <li>• American Board of Foot &amp; Ankle Surgery</li> <li>• National Certification Commission for Physician Assistants (NCCPA)</li> <li>• American Academy of Nurse Practitioners (AANP)</li> <li>• American Nurse Credentialing Center</li> <li>• Applicable Dental Specialty Board</li> <li>• American College of Nurse Midwives</li> </ul>			
<p><b><u>Non-Board Certified Practitioners with Completed Training</u></b> Residency trained practitioners who are completing a course of training in preparation for final certification exam must remain in good standing with the specialty board and complete and pass the board certification exam on time as scheduled.</p>	Documentation included in Credentialing file	MD's, DO's, DPM's, DDS (if applicable)	Must be verified within 180 calendar days.	Initial
<p><b><u>Malpractice History</u></b> Practitioner must supply a full history of malpractice and professional liability claims history. Must show absence of a history of professional liability claims including, but not limited to, lawsuits, arbitrations, settlements or judgments, or must show evidence that history of professional liability claims does not demonstrate probable future substandard professional performance. Must show absence of history of denial or cancellation of professional liability insurance or, must show evidence that history of denial or cancellation of</p>	Supplied by practitioner	All practitioner types	Must be verified within 180 calendar days.	Initial & Recredentialing

<p>professional liability insurance does not demonstrate probable future substandard professional performance. If there is an affirmative response to the related disclosure questions on the application, a detailed response is required from the practitioner. Documentation of malpractice and professional liability claims history is requested from the practitioner on the credentialing application.</p>				
<p><b><u>Work History</u></b> Practitioner must supply a minimum of 5 years of relevant work history on the application or curriculum vitae. If the practitioner has practiced fewer than 5 years from the date of Credentialing, the work history starts at the time of initial licensure. A gap exceeding six months will be reviewed and clarified in writing.</p>	<p>Verified by application or CV</p>	<p>All practitioner types</p>	<p>Must be verified within 180 calendar days.</p>	<p>Initial</p>
<p><b><u>State Sanctions, Restrictions on licensure or limitations on scope of practice</u></b> Practitioner must disclose a full history of all license actions including denials, revocations, terminations, suspension, restrictions, reductions, limitations, sanctions, probations and non- renewals. Practitioner must also disclose any history of voluntarily relinquishing, withdrawing, or failure to proceed with an application in order to avoid an adverse action or to preclude an investigation or while under investigation relating to professional competence or conduct. If there is an affirmative response to the related disclosure questions on the application, a detailed response is required from the practitioner.</p>	<p>Verified directly with the appropriate state licensing or certification agency. The appropriate state agencies are queried directly for every practitioner and if there are any sanctions, restrictions or limitations, complete documentation regarding the action will be requested. The NPDB is also queried for every practitioner.</p>	<p>All practitioner types</p>	<p>Must be verified within 180 calendar days.</p>	<p>Initial and Recredentialing</p>

<p><b><u>Medicare and Medicaid Sanctions</u></b></p> <p>Practitioner must disclose all Medicare and Medicaid sanctions. If there is an affirmative response to the related disclosure questions on the application, a detailed response is required from the practitioner.</p>	<p>The NPDB is queried for every practitioner.</p>	<p>All practitioner types</p>	<p>Must be verified within 180 calendar days.</p>	<p>Initial and Recredentialing</p>
<p><b><u>Medicare Opt Out</u></b></p> <p>Practitioners participating in the Medicare Advantage product are prohibited from voluntarily opting out of Medicare participation.</p>	<p>The Medicare Opt Out website is queried for every practitioner.</p>	<p>All practitioner types</p>	<p>Must be verified within 180 calendar days.</p>	<p>Initial and Recredentialing</p>
<p><b><u>Hospital Admitting privileges</u></b></p> <p>Practitioners must have admitting privileges in good standing, or have a plan for hospital admission by using a Hospitalist or having an arrangement with a participating practitioner. Must show absence of history of loss or limitation of privileges or disciplinary activity by a hospital or other health care facility or must show evidence that history or loss or limitation of privileges does not demonstrate probable future substandard professional performance</p>	<p>The practitioner's hospital privileges are verified by their attestation on the credentialing application stating one of the following using NAMSS Pass or by verification from the indicated hospital:</p> <ul style="list-style-type: none"> <li>• They have hospital admitting privileges</li> <li>• They use a Hospitalist</li> <li>• They have an arrangement with a participating practitioner to admit their patients for them.</li> </ul>	<p>MD's, DO's</p>	<p>Must be verified within 180 calendar days.</p>	<p>Initial and Recredentialing</p>
<p><b><u>Background Checks</u></b></p> <p>Background Checks, including out of state criminal background check, results returned from applicable state agencies.</p>	<p>Applicable Background Check site to include WI Department of Justice and Moore</p>	<p>All practitioner types</p>	<p>Must be verified within 180 calendar days</p>	<p>Initial and Recredentialing</p>

<b><u>Sex Offender Registry Federal Sex Offender Registry is queried</u></b>	<a href="https://www.nsopw.gov/">https://www.nsopw.gov/</a>	All practitioner types	Must be verified within 180 calendar days	Initial a Recrede
<b><u>Wisconsin Circuit Courts Queried for any criminal or professional cases</u></b>	<a href="https://wcca.wicourts.gov/">https://wcca.wicourts.gov/</a>	All practitioner types	Must be verified within 180 calendar days	Initial a Recrede

### **Security Controls Section:**

To ensure that Network Health has credentialing system controls in place for primary source verification, tracking and modification of credentialing information, authorized staff, security of the credentialing information and auditing of Network Health's credentialing process and procedures.

### **Procedure:**

Network Health receives primary source verification documents via USPS, secure email, NCOA approved verification website or fax. All primary source verification documents are electronically date-stamped upon receipt, electronically initialed by credentialing coordinator reviewing the document, electronically entered in the proprietary practitioner database and stored in the credentialing/recredentialing practitioner's credentials electronic file. No paper files are maintained. Primary source verification documents are tracked via an electronic checklist that includes:

- the date the information was received; and
- the date the information was verified; and
- the name or initials of the credentialing coordinator who reviewed/verified the information.

The electronic checklist is stored in the credentialing/recredentialing practitioner's electronic credentialing file.

All modified primary source verification documents are electronically date-stamped upon receipt, initialed or signed by the credentialing coordinator reviewing the document and notification of said modification is sent to the Director or Provider Integration for review and tracking for adequacy. A note is also placed in the notes section of the applicable provider/facility notes section.

Network Health's credentialing department staff are the only authorized staff with the ability to review, modify or delete any credentialing information.

The only time modification/deletion would be necessary is if the practitioner notifies Network Health of changes to the credentialing/recredentialing information, i.e., DEA, license or malpractice coverage expires/renews, a data entry error, duplicate profiles, work history or a change to the practice location.

Appropriate modifications/deletions would be necessary when corrected information was received from the practitioner to correct information with the practitioner's credentialing/recredentialing application, i.e., corrected SSN, corrected employment dates (work history), correction of school name or address, or when duplicate information exists with the practitioner's electronic credentialing file.

In the event information is modified or deleted, it will be tracked on the provider record that includes:

- the date the information was received to modify or delete credentialing/recredentialing information
- the date the credentialing/recredentialing information was modified or deleted

- an explanation about why the information was modified or deleted
- the name or initials of staff who modified or deleted the information
- if verbal verification occurs, note the person who they spoke with.

Inappropriate modifications to credentialing information include but are not limited to:

- Altering credentialing approval dates
- Altering dates on verifications
- Unauthorized deletion of provider files or documentation

The Network Health Credentialing department have “read/write” access to Network Health’s proprietary practitioner database, protecting the credentialing/recredentialing information from unauthorized modification and unauthorized release of credentialing information. All other staff has “read only” access. No other entities will have access to Network Health’s credentialing/recredentialing information.

Network Health has a secure proprietary practitioner database where practitioner’s credentialing/recredentialing electronic information is stored. The secure proprietary practitioner database is a password-protected electronic cloud based system and only Network Health staff who need “read/write access” will be granted access by Network Health’s IT staff via the approval of the Director of Provider Integration.

Staff approved to access information are required to:

- Use strong passwords
- Avoid writing down passwords
- Use different passwords for different accounts
- Change passwords periodically
- Changing or withdrawing passwords, including alerting appropriate staff who oversee computer security to change passwords when appropriate

Network Health’s Provider Integration Director audits quarterly the full universe of changes and any prior notified modifications shared from staff to ensure steps 1-4 are adhered to during the credentialing/recredentialing process. A log of any inappropriate deletions/modifications identified during the audit, will be kept along with resolution details. In the event issues are identified, Network Health’s Director of Provider Integration will address the issue with necessary staff for quick, timely resolution. Quarterly monitoring will occur to assess the effectiveness of the resolution until there are no issues identified for at least three consecutive quarters. Also, each provider file is audited by another Credentialing staff prior to review by the Medical Director, designee, or Credentials Committee.

Network Health’s Director of Provider Integration will review job roles and current user access, semi-annually, to ensure system access is still appropriate for each roll.

Access to office after hours is limited to office staff and custodial staff. Custodial staff does not have keys to any electronic credentials to access computer systems.

**Regulatory Citations:** None

**Related Policies:** None

**Related Documents:** None

<b>Origination Date:</b> 08/13/2015	<b>Approval Date:</b> 2/1/2024	<b>Next Review Date:</b> 2/1/2025
<b>Regulatory Body:</b> NCQA, CMS	<b>Approving Committee:</b> Credentials Committee	<b>Policy Entity:</b> NHP/NHIC/NHAS
<b>Policy Owner:</b> Jennifer Delebreau	<b>Department of Ownership:</b> Credentialing	<b>Revision Number:</b> 7
<b>Revision Reason:</b> 10/27/2016–Changes made to meet NCQA Standards. 10/06/2016–Transferred to new policy template. 10/26/2017–Annual review. 08/23/2018–Annual review. 09/01/2019–Annual review. 07/09/2020-Added new NCQA requirements and change to procedure instead 01/20/2021-Updated to include 2022 NCQA standards 1/19/2022 – Annual Review 1/18/2023 – Annual review and added Security language 4/27/2023 – Annual Review 1/8/2024 – Annual Review. Credentialing Committee approved 2/4/2024		