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# Credentialing and Recredentialing Policy

Approved by: Quality Management  
Committee

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## I. PURPOSE

Blue Cross Blue Shield of North Dakota's (BCBSND) Credentialing/Recredentialing Policy, herein referred to as "Policy", ensures the systematic review of health care providers requesting participation with BCBSND. The Policy includes requirements and procedures for verifying a Professional Health Care Provider or Institutional/Facility Provider by reviewing their qualifications to practice. The Policy also includes procedures for verifying that Professional Health Care Providers have met eligibility standards and requirements such as education, licensure, professional standing, services, accessibility, utilization and quality.

The Policy includes processes to ensure compliance with applicable state and federal laws and URAC standards, in verifying records through credentialing/recredentialing, in monitoring and reporting credentialing activities to appropriate BCBSND committees, and in overseeing the functions of site-visits and delegated credentialing.

The policy provisions serve as guidelines for all BCBSND credentialing/recredentialing decisions. The guidelines eliminate unfair business practices such as:

- Prejudice in favor of or against individual circumstances or actions and promote consistency of interpretation and application of policy requirements.
- Issues of race, color, creed, religion, sex, national origin, marital status, disability, age, or sexual orientation are not considered during the credentialing/recredentialing process.
- BCBSND does not discriminate for the participation, reimbursement, or indemnification of any provider who is acting within the scope of his or her license or certification under applicable state law, solely on the basis of that license or certification.
- BCBSND does not discriminate against particular Professional Health Care Providers that serve high-risk populations or specialize in conditions that require costly treatment.

The Policy is reviewed annually by the Credentialing Committee and submitted to the Quality Management Committee for approval. Staff will review any credentialing/recredentialing files within a six-month period that were negatively affected by a policy when a subsequent revision of the same policy would result in a more favorable position. Contracted authorized parties with BCBSND may have access to review Provider files in person at 4510 13<sup>th</sup> Avenue S, Fargo, North Dakota.

## II. SCOPE

- A. All licensed Providers seeking participation with BCBSND shall meet established Policy requirements.
- B. The Credentialing Committee, Quality Management Committee, Quality Committee of the Board, and Board of Directors review and approve the Policy requirements annually.

## III. EVALUATION AND ACCOUNTABILITY

### *Accountable Committees*

- A. The **Board of Directors (Board)**, as the governing body of BCBSND, has ultimate responsibility for the Policy. The Board delegates oversight of the Policy to the Quality Committee of the Board and delegates the responsibility for selection, credentialing, and recredentialing to the Credentialing Committee.
- B. The **Quality Committee of the Board (Quality Committee)**, a sub-committee of the Board, is responsible for the oversight and direction of BCBSND's Quality Management Plan, of which the Credentialing and Recredentialing Policy is a part, for all providers and enrollees. The Quality Committee of the Board reports credentialing and recredentialing activities to the Board semiannually or as they arise.

- C. The **Quality Management Committee (QMC)** coordinates BCBSND's Quality Management Plan for all providers and enrollees. QMC reports credentialing and recredentialing activities to the Quality Committee semiannually or as they arise. This committee reviews and approves recommended changes to this Policy.
- D. The **Credentialing Committee (Committee)** meets as often as necessary to fulfill its responsibilities, but no less than quarterly to make determinations on all credentialing/recredentialing applications. The Credentialing Committee Chair conducts the meetings and reports issues relating to credentialing/recredentialing activities to QMC.
1. **Membership.** The Committee consists of, at a minimum, the following members:
    - a. Chair, Medical Director of BCBSND Health Network Innovation
    - b. Vice President of Clinical Excellence and Quality
    - c. Director Quality Management
    - d. At least one Physician, who is a BCBSND participating Professional Health Care Provider, and has no other role in BCBSND's management activities.

Credentialing Staff provides support to Committee meetings.

2. **Responsibilities.** The Committee is responsible for:
  - a. Establishing, reviewing, and approving the policies, standards for participation, procedures and processes that govern credentialing operations;
  - b. Providing guidance to organization staff regarding the overall direction of the credentialing program.
  - c. Reporting the effectiveness of the credentialing program to organization management.
  - d. Reviewing standards of care for reasonableness and the general status of providers' abilities to meet such standards.
  - e. Ensuring recredentialing is performed thoroughly and in compliance with policy guidelines;
  - f. Monitoring activities of state licensing boards for restricted or terminated licenses;
  - g. Monitoring sanction and termination activities to ensure due process;
  - h. Developing and implementing oversight activities to monitor any delegated credentialing functions;
  - i. Reporting credentialing activities to the QMC and to external entities (i.e. licensing boards, National Practitioners Data Bank (NPDB)) as deemed applicable;
  - j. Accessing and evaluating clinical peer input when discussing standards of care for a particular type of provider; and
  - k. Ensuring minutes of Committee meetings are maintained, including all actions determined by the Committee.

The **Credentialing Committee Chair (Chair)**, a BCBSND Health Network Innovation Medical Director or his/her designee, is the senior clinical person responsible for the

oversight of the clinical aspects of the Policy. In addition, the Chair may, acting on behalf of the Committee, approve, deny or pend Provider applications in accordance with Policy standards.

3. **Voting Procedure and Quorum.** Professional Health Care Provider committee members have voting privileges, with the exception of the Chair, who shall vote only in the event of a tie. Fifty-one percent (51%) of all voting committee members shall constitute a quorum for the purposes of conducting official Committee business. A virtual vote may be requested so as not to delay the decision-making authority of the committee. Action shall be taken by a majority vote. Committee members may attend by conference call.
4. **Term of Office.**
  - a. BCBSND staff members serve on the Committee as a requirement of their position at BCBSND.
  - b. Non-employed BCBSND Participating Professional Health Care Providers are appointed by a majority vote of the Committee to a three-year term of office. If a Professional Health Care Provider leaves before completing his/her term, the Chair makes a recommendation, which requires majority approval by the Committee.
5. **Record Keeping.** Committee business shall be documented and a permanent, signed and dated record of meeting proceedings, findings, and actions shall be kept. Confidentiality of the meeting minutes, as well as all discussions, deliberations, and decisions made, shall be strictly maintained.
6. **Consultations.** Professional/Peer Advisors are appointed by the Chair to provide confidential consultation on Policy issues as may arise from time to time. The Chair selects advisors based on reputation, recognized skill in practice, and advanced training.

#### IV. HEALTH CARE PROVIDER DEFINITIONS

- A. A **Professional Health Care Provider** is an individual who provides professional health care services and is licensed, certified, or registered by the state in which the services are performed. Listing the Professional Health Care Provider below does not guarantee payment under BCBSND medical insurance plans. Professional Health Care Providers include:

- Audiologist (AUD)
- Certified Diabetic Educator (CDE)
- Certified Nurse Midwives (CNM)
- Certified Registered Nurse Anesthetist (CRNA)
- Clinical Nurse Specialist (CNS)
- Dentist (DDS)
- Doctor of Chiropractic (DC)
- Doctor of Medicine (MD)
- Doctor of Osteopathic Medicine (DO)
- Doctor of Podiatric Medicine (DPM)
- Licensed Applied Behavior Analyst (LABA)
- Licensed Addiction Counselor (LAC)
- Licensed Independent Clinical Social Worker (LICSW)
- Licensed Marriage Family Therapists (LMFT)
- Licensed Professional Clinical Counselor (LPCC)
- Licensed Registered Dietician (LRD)

- Nurse Practitioner (NP)
- Occupational Therapist (OT)
- Optometrist (OD)
- Pharmacist (RPH)
- Physician Assistant (PA)
- Physical Therapist (PT/RPT)
- Psychiatric Nurse Specialist (PNU)
- Psychologists (PHD, PSYD)
- Speech Therapist (ST)

B. An **Institutional/Facility Provider** is an organization that provides health care services. Institutional/Facility Providers include:

1. Acute Care Hospitals and subunits
2. Behavioral Health Programs:
  - Freestanding Psychiatric Hospital
  - Partial Hospitalization Program (PHP)
  - Intensive Outpatient Program (must be associated with Partial Hospitalization)
  - Psychiatric/Substance Abuse Facility
  - Residential Treatment Center
3. Ancillary Providers:
  - Air and Ground Ambulance
  - Comprehensive Outpatient Rehab Facility
  - Diabetic Education Provider or DSMT
  - Freestanding Dialysis Center
  - Freestanding Outpatient Physical Therapy Facility
  - Freestanding Sleep Lab
  - Freestanding Surgical Centers/Ambulatory Surgery Center
  - Home Health Care Agency
  - Home Infusion Center
  - Home Medical Equipment
  - Hospice Facility
  - Independent Orthotics/Prosthetics Supplier
  - Independent Lab
  - Long Term Acute Care Facility
  - Mobile Radiology Supplier
  - Optometric Supplier
  - Public Health Unit
  - Radiology
  - Skilled Nursing Facility

Provider titles or abbreviations vary from state to state and may change from time to time.

## V. CREDENTIALING STANDARDS

A. **Applications.** Trained and qualified Credentialing Specialists review all credentialing/ recredentialing applications for completeness, accuracy, and conflicting information. A second review of each application is performed by a different Provider Networks staff member prior to submission for Committee review. A random sample of applications is audited for quality each week based on volume, averaging approximately 20 applications per Specialist per month. All applications, including documentation and attachments, are presented to the Chair and/or Committee for review and approval.

1. **Professional Health Care Providers.** Professional Health Care Providers must meet the applicable standards to be considered for participation. It is the ultimate responsibility of the Professional Health Care Provider to ensure complete release of information from any entity queried by BCBSND or their designee. The signature included in the credentialing application cannot be dated more than one hundred eighty (180) days prior to Committee review. The standards are as follows:
  - a. Professional Health Care Provider will attest by date and signature to the accuracy of all information in the Credentialing Application. Substantial errors of fact involving documents discovered before or after appointment can be the basis for non-selection or, after appointment, adverse action including termination. Electronic signatures, such as faxed, digital, electronic, scanned or photocopied are acceptable and have the same legal effect and enforceability as a handwritten signature.
  - b. Professional Health Care Provider will consent to the inspection of records and documents pertinent to consideration of his/her request for appointment and privileges.
  - c. Contracted Professional Health Care Provider shall maintain policies of general and professional liability (malpractice) coverage to insure Provider against any claim for damages arising by reason of personal injury or death resulting directly or indirectly from the performance of the provider's participation agreement. Such coverage shall be in an amount equal to the greater of the highest amount required by law or in the absence of such law, the community standard for such coverage. Provider shall provide a certificate of such coverage upon application, entitling BCBSND to receive thirty (30) days' prior notice of any change, termination or expiration of coverage. The certificate or an accompanying letterhead must clearly state the specified provider is covered by the policy.
  - d. Professional Health Care Provider must provide information related to professional claims history – defined as cases that are settled or have resulted in an adverse judgment against the provider.
  - e. Professional Health Care Provider is not currently restricted from receiving payments from any state or federal program, including, but not limited to Medicare or Medicaid. Individual consideration may be given based upon the seriousness of the restriction.
  - f. Professional Health Care Provider must have no unexplained chronological gaps greater than 3 months in his/her recent professional career history.
  - g. Professional Health Care Provider does not have an active problem with chemical substance abuse. Professional Health Care Providers who have had prior instances with chemical substance abuse may be required to provide reasonable documentation that they have been chemical substance free prior to application.
  - h. Professional Health Care Provider must report any current or history of loss of licensure, registration or certification. Professional Health Care Providers must list all health care licenses held in any state or jurisdiction and explain licenses that are not current, have ever been voluntarily relinquished or have been subjected to disciplinary action.
  - i. Professional Health Care Provider must currently have and maintain the necessary state health care license, registration, or certification appropriate to their practice or type of service provided.
  - j. Professional Health Care Provider must be free of physical and mental health conditions that would affect, or likely affect, his/her ability to deliver the care expected in their designated scope of practice.

- k. Professional Health Care Provider must not have been convicted of, or pled no contest to, any felony charges. Individual consideration may be given to Professional Health Care Providers with felony charges unrelated to healthcare.
- l. Professional Health Care Provider must report any history of the loss or limitation of hospital or other organizational clinical privileges.

***Professional Health Care Provider specific standards include:***

- m. NP, CNM, CNS and CRNA must maintain current certification by a professional organization offering certification in the specialty of practice and current licensure in the state in which they are practicing. Their scope of practice shall be consistent with the Nurse Practice Act of the state in which they are licensed to practice.
  - n. Professional Health Care Providers who have hospital admitting privileges shall maintain current medical staff appointment and delineated clinical privileges at an eligible institution for the scope of practice for which the Professional Health Care Provider is being considered. This requirement may be waived for medical doctors practicing in rural hospitals.
  - o. Non-board certified physicians must have graduated from medical school, other appropriate schooling and/or completion of residency. Board certified physicians must be certified by compendium; the American Board of Medical Specialties (ABMS), American Osteopathic Association (AOA), or a specialty board recognized by the National Committee of Quality Assurance (NCQA) or URAC.
  - p. Physician graduates from a foreign medical school must be certified by the Educational Commission for Foreign Medical Graduates (ECFMG).
  - q. Professional Health Care Providers must hold a current DEA certificate, if applicable.
  - r. Physician Specialists must maintain a medical staff appointment in their areas of specialty at an institution with current accreditation by Medicare and/or The Joint Commission or Commission on Accreditation of Rehabilitation Facilities (CARF), if applicable. This requirement may be waived for physicians in small rural hospitals.
  - s. Physician Assistants must maintain current national certification as physician assistants (PA-C) by the National Commission for the Certification of Physician Assistants and maintain current physician assistant practice status granted by the state in which they are practicing. This may be in the form of a state certificate, license, or registration, depending on the state.
2. **Institutional/Facility Providers.** Institutional/Facility Providers must meet the following standards to be considered for BCBSND participation:

Acute Care Hospitals (Short and Long Term)

- State Licensure (non-provisional)
- Provide and maintain evidence of Medicare certification OR accreditation by The Joint Commission or another CMS approved national accreditation organization with deeming authority
- Evidence of malpractice insurance

Freestanding Psychiatric Hospitals

- State Licensure (non-provisional)



- Provide and maintain evidence of Medicare certification OR accreditation by The Joint Commission or another CMS approved national accreditation organization with deeming authority
- Evidence of malpractice insurance

Psychiatric/Substance Abuse Facility (Intensive Outpatient Program (IOP) -

Must have established Partial Hospitalization Program

- State Licensure (non-provisional) – applies to substance abuse program only
- Evidence of malpractice insurance
- Meets BCBSND IOP program requirements

Psychiatric/Substance Abuse Facility (Partial Hospitalization Program (PHP)

- State Licensure (non-provisional) – applies to substance abuse program only
- Evidence of malpractice insurance
- Meets BCBSND PHP program requirements

Psychiatric/Substance Abuse Facility (Residential Treatment Center (RTC)

- State Licensure (non-provisional)
- Evidence of malpractice insurance
- Meets BCBSND RTC program requirements

Air and Ground Ambulance

- State Licensure (non-provisional)
- Evidence of malpractice insurance, if applicable

Comprehensive Outpatient Rehab Facility

- State Licensure (non-provisional)
- Provide and maintain evidence of Medicare certification Accreditation by CARF or another CMS approved national organization with deeming authority.
- Evidence of malpractice insurance

Diabetic Education Provider or DSMT

- Accreditation by the American Diabetes Association (ADA) or American Association of Diabetes Educators (AADE) or another CMS approved national accreditation organization with deeming authority
- Provide and maintain evidence of Medicare participation (receive payments)
- Evidence of malpractice Insurance

Freestanding Dialysis Center (Renal Treatment Center)

- Provide and maintain evidence of Medicare certification
- Evidence of malpractice insurance

Freestanding Outpatient Physical Therapy Facility

- State licensure (non-provisional)
- Provide and maintain evidence of Medicare certification OR accreditation by The Joint Commission or another CMS approved national accreditation organization with deeming authority
- Evidence of malpractice insurance

Freestanding Sleep Lab

- Provide and maintain evidence of Medicare participation (receive payments) OR accreditation by a CMS approved national accreditation organization with deeming authority
- Evidence of malpractice insurance

Freestanding Surgical Centers/Ambulatory Surgery Centers

- State Licensure, if applicable (non-provisional)
- Provide and maintain evidence of Medicare certification OR accreditation by The Joint Commission, the Accreditation Association of Ambulatory Health Care (AAAHC), American Association for the Accreditation of Ambulatory Surgical Facilities (AAAASF), or another CMS approved national accreditation organization with deeming authority.
- Evidence of malpractice insurance

Home Health Agencies

- State Licensure (non-provisional)
- Provide and maintain evidence of Medicare certification/participation (receive payments)
- Evidence of Malpractice insurance

Home Infusion Center

- Provide and maintain evidence of Medicare certification/Participation (receive payments)
- Evidence of malpractice insurance

Home Medical Equipment

- Provide and maintain evidence of Medicare certification/participation (receive payments)
- Evidence of malpractice insurance

Hospice Facility

- State licensure (non-provisional)
- Provide and maintain evidence of Medicare certification/participation (receive payments)
- Evidence of malpractice insurance

Independent Orthotics/Prosthetics Supplier

- Provide and maintain evidence of Medicare certification
- Evidence of malpractice insurance

Independent Lab

- Provide and maintain evidence of Medicare certification or CLIA number
- Evidence of malpractice insurance

Long Term Acute Care Facility

- State Licensure (non-provisional)
- Provide and maintain evidence of Medicare certification OR accreditation by the Joint Commission or another CMS approved national accreditation organization
- Evidence of malpractice insurance

Mobile Radiology Supplier

- Provide and maintain evidence of Medicare certification or FDA number
- Evidence of malpractice insurance

Optometric Supplier

- Evidence of malpractice insurance

Public Health Unit

- Evidence of malpractice insurance
- Listed on state health department website

### Radiology

- Provide and maintain evidence of Medicare certification or FDA number
- Evidence of malpractice insurance

### Skilled Nursing Facility

- State Licensure (non-provisional)
- Provide and maintain evidence of Medicare certification OR accreditation by The Joint Commission or another CMS approved national accreditation organization
- Evidence of malpractice insurance

If the hospital or ancillary facility is not Medicare certified/participating or accredited (as specified above), a site visit may be conducted to review the following:

- Organization plan
- Policy and procedure manuals
- Staffing ratios
- Equipment maintenance programs
- Accessibility
- Medical records keeping system
- Quality assurance activities
- Risk management programs
- Malpractice records
- Carrier reports
- Safety records
- Emergency procedures

3. **Erroneous information.** BCBSND will contact the Provider if any information received from a primary source differs from what was disclosed on the application. The Provider has the right to correct erroneous information. Any deficiencies are documented and attached to the Provider's file. BCBSND is responsible to review the file for completeness, accuracy and conflicting information prior to submission to the Chair and/or Committee for consideration.
4. **Timeframes.** The process of credentialing/recredentialing Providers is one hundred eighty (180) days from the signature date on the credentialing application, contingent upon required information being received on a timely basis. Providers may contact the Credentialing Department by phone, email or in person to inquire on status of credentialing application and all inquiries will be documented.
5. **Confidentiality Policy.** BCBSND shall hold in confidence all data and information that it acquires in relation to this Policy. All documents are confidential, maintained in locked files or password protected electronic programs, and accessed by authorized personnel only.
  - a. All credentialing staff entering credentialing information is assigned passwords to prevent unauthorized staff from accessing screens containing confidential information. Only individuals who need access to the information to perform their assigned duties will have access to the information. The Director Quality Management determines the level of authorized user access to credentialing data.
  - b. Confidentiality training is conducted annually for all personnel accessing credentialing information including, but not limited to:
    - i. Credentialing committee members
    - ii. Credentialing staff (including temporary staff)

- B. **Primary Source Verification.** During the credentialing process, BCBSND primary source verifies the following Professional Health Care Provider and Institutional/Facility Provider credentialing

information by phone, internet, fax or letter. The documentation must be dated no more than one hundred eighty (180) days prior to Committee review:

- A valid license/certification to practice in the state(s) via state licensing agency/board
- Board certification, if applicable, via American Board of Medical Specialties (ABMS), American Osteopathic Association (AOA), American College of Nurse Midwives (ACNM), National Commission on Certification of Physician Assistants (NCCPA), American Association of Nurse Anesthetists (AANA), American Dental Association (ADA), American Board of General Dentistry (ABGD) or a specialty board recognized by NCQA or URAC. In the absence of board certification, the highest level of education or training is verified through the American Medical Association (AMA), state licensing agency/board or academic institution.
- Medicare/Medicaid sanction activity
- National Practitioners Data Bank (NPDB)
- Accreditation status, if applicable
- Criminal history background checks and licensure/disciplinary screening reports for MDs and DO's

## VI. RECREDENTIALING STANDARDS

Recredentialing of Professional Health Care Providers/Institutional/Facility Providers is conducted every three years to review the last three years of history.

- A. **Professional Health Care Provider.** BCBSND will provide a recredentialing application to Professional Health Care Providers scheduled for recredentialing. The Professional Health Care Provider is required to update and return a signed and dated recredentialing application and meet the following applicable standards for continued participation consideration. The signature included in the recredentialing application cannot be dated more than one hundred eighty (180) days prior to Committee review.

BCBSND verifies the following information by phone, internet, fax or letter. The documentation must be dated no more than one hundred eighty (180) days prior to Committee review:

- A valid license/certification to practice in the state(s) via state licensing agency/board
- Staff privileges, including admitting privileges, are in good standing
- Valid DEA certificate, if applicable
- Board certification, if applicable, via American Board of Medical Specialties (ABMS), American Osteopathic Association (AOA), American College of Nurse Midwives (ACNM), National Commission on Certification of Physician Assistants (NCCPA), American Association of Nurse Anesthetists (AANA), American Dental Association (ADA), American Board of General Dentistry (ABGD) or a specialty board recognized by NCQA or URAC.
- Medicare/Medicaid sanction activity through National Practitioners Data Bank (NPDB) or the Department of Health and Human Services (DHHS)
- Appropriate levels of malpractice insurance are maintained
- Professional liability claims history since initial credentialing, if applicable, through NPDB and malpractice carrier.
- Professional Health Care Provider is compliant with BCBSND's Quality Management Program.

- B. **Institutional/Facility Provider.** BCBSND will provide a recredentialing form to Institutional/Facility Providers scheduled for recredentialing. Recredentialing criteria includes the following:

- Valid copy of full unrestricted Accreditation by relevant governing organization, if applicable
- Valid copy of license, if applicable

- Valid evidence of Medicare Certification, if applicable
- Provider is compliant with BCBSND's Quality Management Program.

Every effort is made to complete recredentialing within thirty-six (36) months of the most recent credentialed or recredentialed date. If the Provider is noncompliant with the recredentialing process, the Provider will be required to complete the initial credentialing application. When a new credentialing file is established, a note will be made on the Credentialing checklist referring back to the old file for the initial verification of the credentials that do not expire or change over time, such as education.

C. **Primary Source Verification.** During the recredentialing process, BCBSND primary source verifies the following Professional Health Care Provider and Institutional/Facility Provider recredentialing information by phone, internet, fax or letter. The documentation must be dated no more than one hundred eighty (180) days prior to Committee review:

- A valid license/certification to practice in the state(s) via state licensing agency/board as minimally required to engage in clinical practice
- Board certification, if applicable, via American Board of Medical Specialties (ABMS), American Osteopathic Association (AOA), American College of Nurse Midwives (ACNM), National Commission on Certification of Physician Assistants (NCCPA), American Association of Nurse Anesthetists (AANA), American Dental Association (ADA), American Board of General Dentistry (ABGD), or a specialty board recognized by NCQA or URAC

## VII. CREDENTIALING/RECREREDENTIALING DECISIONS

BCBSND reserves the right to deny participation to any Provider at its sole discretion during the credentialing or recredentialing process. The Committee has final authority to approve or disapprove applications by providers for organization participation status, regardless of meeting the credentialing standards. Only completed applications will be submitted to the Committee for review. Upon Committee determination, the Provider seeking initial credentialing will be provided a written notification, sent via mail, email or fax, acknowledging acceptance or denial of participation within ten (10) business days of the Committee decision. The Provider is notified through a statement on the recredentialing application that participation will remain active unless otherwise notified.

BCBSND will contact the Provider if any information received from a primary source differs from what was disclosed on the application. The Provider has the right to correct erroneous information. Any deficiencies are documented and attached to the Provider's file. BCBSND is responsible to review the file for completeness, accuracy and conflicting information prior to submission to the Chair for consideration.

A. **Approved Applications.** The Chair, having delegated authority, may approve clean applications meeting Policy standards.

Clean applications are defined as:

- The Provider has completed all applicable sections of the credentialing application
- Where indicated, the Provider has signed and dated the credentialing application
- All necessary support documentation has been submitted and is included with the credentialing application in the Provider's file
- The Provider meets the credentialing standards and there are no significant issues to report to the credentialing committee (Section B).

The Committee reviews/approves a list of Providers approved by the Chair during their regularly scheduled quarterly meetings. The Provider's credentialing/ recredentialing is effective on the Committee or Chair approval date.

B. **Applications with possible significant issue(s).** Significant issues identified in the application that may impact the quality of care or services delivered may include (but are not limited to) the following:

- History of loss or limitation of privileges or disciplinary activity
- Disclosure of any physical, mental, or substance abuse problems that could, without reasonable documentation, impede the Professional Health Care Provider's ability to provide care according to accepted standards of professional performance or pose a threat to the health or safety of patients
- Malpractice Claims History exceeding 3 claims in the past 5 years
- Provisional License

A possible significant issue(s) identified by BCBSND staff is forwarded to the Chair for review. The Chair may decide one of the following.

1. Determine if additional information is required prior to consideration by the Committee.
2. Determine that the possible significant issue(s) meets or does not meet Policy standards and present to the Committee for decision.

The Committee shall review the application with possible significant issue(s) for decision. The Committee may decide one of the following:

1. Determine the application meets BCBSND Credentialing/Rec credentialing standards and approve participation. Staff is directed to communicate the decision according to Approved Applications processes.
2. Determine the application does not fully meet standards and grant restricted or conditional participation. (e.g. A provider who has been issued a provisional license due to new construction or transfer of ownership and is awaiting a licensing site visit may be granted conditional approval. The conditional approval timeframe would be expected to be the same timeframe specified on the provisional license.)
3. Determine the application does not meet standards and deny participation.

C. **Denied Applications.** The Committee will consider the following prior to issuing a denial of participation. This is not an all-inclusive list and other factors may be considered when issuing a denial of participation.

- Substandard credentials
- Omission, misrepresentation, or falsification of information on the credentialing application
- Noncompliance with the Policy
- Circumstances that may pose an immediate risk to members as determined by the Committee
- Provider is not compliant with BCBSND's Quality Management Program

The process for denial of BCBSND participation is as follows:

1. The Committee makes denial determination and the findings are reported to QMC.
2. QMC communicates denial to the Quality Committee.

3. The Committee Chair will send a written notice within ten (10) business days to the Provider indicating the following:
  - a. Their application for BCBSND participation was denied
  - b. The reason(s) for the denial
  - c. The appeal process

D. **Appeal Process.** Providers have the right to request an appeal of a denied or restricted participation application if the participation decision was due to non-compliance with the Policy. To request an appeal, the Provider will have thirty (30) days from the receipt of notice of a restricted participation or denial of participation to submit a written request for appeal. The request outlines why the Provider disagrees with the decision and includes new information and/or highlights specific points for reconsideration. QMC will meet and review the appeal during the next regularly scheduled meeting. Upon review, QMC will provide a written notice upholding, reversing, or revising the earlier decision within ten (10) business days of QMC's decision.

If the initial denial of participation is upheld, Health Network Innovation may report the action to the NPDB and the appropriate state licensing board. Issues are not reported until after the appeal has been reviewed and QMC makes a final decision.

If the Provider does not request an appeal review within thirty (30) days, the Provider is deemed to have waived their right to a review and accepted QMC's decision. The Provider may reapply for participation eighteen (18) months after denial for participation. A record of appeals is kept as part of the regular QMC's minutes. These peer review materials are considered confidential and privileged.

- E. **Professional Health Care Providers Not Credentialed by BCBSND**
- Professional Health Care Providers that are not licensed, certified or registered by the appropriate state agency, professional board or organization in accordance with the laws of the state in which the services are provided.
  - Professional Health Care Providers deemed non-payable by BCBSND
- F. **Eligible Professional Health Care Providers that are not Credentialed**  
Hospital-based Professional Health Care Providers who practice exclusively within an inpatient setting and do not bill individually under a provider identification number.

## VIII. ONGOING MONITORING

Between the credentialing and recredentialing processes, BCBSND monitors Professional Health Care Providers' and institutional Institutional/Facility Providers' continuing compliance with criteria for participation by periodic review of:

- A. State licensing boards, minutes and websites for sanctions, restrictions and other actions taken against a provider's license, documenting in writing that this review was performed. Documentation is kept in the Provider Networks department. Documentation of actions taken against a specific Provider is kept in the individual provider's credentialing file.
- B. The Office of Foreign Assets Control (OFAC) list of Specially Designated Nationals and Blocked Persons and Officials of Blocked Countries, the Office of the Inspector General (OIG) List of Excluded Individuals/Entities (LEIE) and the U.S. General Services Administration (GSA) System for Award Management (SAM), documenting in writing that this review was performed. BCBSND's Compliance Department runs the exclusion scan monthly, comparing BCBSND's provider files against these lists using software BCBSND has purchased for this purpose. If a

possible match occurs, Compliance works with Provider Networks to verify the validity of the match and determine if further research is required.

- C. Documentation of complaints and grievances.

In instances where a Provider ceases to comply with criteria, a report is provided to and reviewed by the Committee for action up to and including termination of participation, if necessary.

## **IX. QUALITY MANAGEMENT PROGRAM**

- A. BCBSND's Quality Management Program provides planned, systematic activities and processes to monitor and evaluate patient care and services for the primary purpose of assisting Providers to improve quality.
- B. In support of the Quality Management Program, BCBSND's Corrective Action Policy ensures BCBSND implements timely, effective actions when indicators reveal a need for improved performance by a Provider. The policy outlines how BCBSND may initiate a corrective action if a Provider does not comply with BCBSND's performance standards.

## **X. PROVIDER DIRECTORY**

BCBSND credentialing staff will update all provider directories such that:

- A. Within forty-five (45) calendar days of the date that both the credentialing and contracting processes are completed, a Provider initially approved for network participation is displayed in the online provider directory. A printed copy of the online provider directory is available upon request from member services.
- B. Once it is determined that a participating Provider has not been recredentialed for any reason or no longer meets credentialing or performance standards, the Provider is removed from online versions of the provider directory within five (5) business days of the date of that determination.
- C. Within forty-five (45) calendar days of determining that a participating Provider is no longer participating, the Provider is removed from electronic versions of the provider directory.

This includes but is not limited to PIN maintenance and network maintenance review to determine the status of ongoing network participation by a provider.

- D. Within forty-five (45) calendar days of receiving updated provider information, the updated provider information is displayed in electronic versions of the provider directory. Requests for updated information are sent periodically to providers requesting confirmation of accuracy of specified data elements and any updates needed.

## **XI. CREDENTIALING/RECREDENTIALING DELEGATION**

BCBSND may delegate the credentialing and recredentiaing functions to an organization that has a credentialing program that meets or exceeds BCBSND requirements and URAC standards. This is accomplished through a delegation agreement that defines both parties' responsibilities in credentialing/recredentiaing of health care providers employed by or under contract with the Delegate.

- A. The following requirements must be met for delegation to occur:
  1. The organization must be recognized as a Delegate, evidenced by a Credentialing Delegation Agreement with BCBSND.



2. The Delegate organization's policies, procedures and standards for credentialing must meet BCBSND requirements as defined in this Policy.
  3. The Credentialing Delegation Agreement will define acceptable performance standards the organization is required to meet for credentialing/recredentialing.
  4. The Delegate agrees that BCBSND retains authority to approve network Providers, and to terminate or suspend participation.
  5. The Delegate must allow BCBSND personnel access to or provide the information and documents for the purposes of auditing compliance with the agreement and BCBSND's credentialing/recredentialing requirements.
  6. The Delegate must provide the most recent credentialed or recredentialed date for its Professional Health Care Providers to BCBSND.
  7. BCBSND will review and verify the Delegate's listing of approved Providers with BCBSND's listing of Providers that have been denied, decertified or terminated. Notification will be sent to the Delegate upon final determination by the Committee or Chair.
- B. BCBSND will provide an annual report on delegated credentialing oversight and if conducted, the report will include the findings of the oversight to the Committee. Oversight will be conducted as follows:
1. Every three (3) years, BCBSND will conduct an evaluation of ten percent (10%) or no less than ten (10) and no more than thirty (30) of the active health care provider files credentialed/recredentialed since the most recent evaluation to assess compliance with credentialing standards. If not conducting a survey onsite, then randomly-requested credentialing files are sent either by certified mail, fax or electronically or otherwise made available to BCBSND within a specified number of hours or days of the request.
  2. BCBSND will evaluate the Delegate's capacity to perform the delegated activities prior to delegation and/or upon the initial evaluation of the Delegate's credentialing/recredentialing policy.
  3. The Professional Health Care Provider's credentialing/recredentialing is effective on the Delegate's approval date. The Committee retains final authority and may over-ride the Delegate's decision, if there is cause. In such an instance, the participating Professional Health Care Provider would be terminated from the network and the appropriate process followed.
  4. BCBSND will conduct an annual performance evaluation of policies, procedures, and committee minutes.
  5. BCBSND will review Delegate's credentialing performance reports.
  6. The Committee or Chair will notify the Delegate in writing of any deficiencies within thirty (30) calendar days of the assessment.
  7. Delegate must submit a corrective action plan within thirty (30) calendar days of receipt of a deficiency report.
  8. When the Delegate completes the corrective action plan, a re-review is conducted and the Delegate is notified of the results or any further recommendations.

9. If Delegate fails to perform delegated functions or make required corrective actions, the Chair shall have the authority to terminate the Delegate's agreement in accordance to termination provisions of the agreement.

If primary source verification is delegated to an entity that is certified as a Credentialing Verification Organization (CVO) by URAC, no oversight is required in the areas of certification.

## **XII. CONSUMER NOTIFICATION REGARDING PROVIDER STATUS**

Consumers currently enrolled with BCBSND, will be notified should their provider be made non-payable, or voluntarily (includes non-renewal) or involuntarily terminate participation with BCBSND. This notification is sent within fifteen calendar days of the determination or notification date to each enrollee who received services from the terminated provider in the past eighteen months. The notification includes information on how the enrollee can access information or receive customer support in selecting a new provider.