



Section: <b>Provider Network Management</b>	Procedure Name: <b>Credentialing Reciprocity Procedure</b>	Procedure #: <b>P02.03.01</b>
Overarching Policy: <b>2.02/2.03 Credentialing &amp; Re-Credentialing – BH Practitioners and Organizational Providers</b>		
Owner: <b>Director of Provider Network</b>	Reviewed By: <b>Mila C. Todd</b>	Total Pages: <b>5</b>
Required By: <input type="checkbox"/> BBA <input checked="" type="checkbox"/> MDHHS <input type="checkbox"/> Other (please specify): _____	Final Approval By:  <i>Mila C. Todd</i> <u>Mila Todd (Mar 31, 2023 05:58 EDT)</u>	Date Approved:  Mar 31, 2023
Application: <input checked="" type="checkbox"/> SWMBH Staff/Ops <input checked="" type="checkbox"/> Participant CMHSPs <input type="checkbox"/> SUD Providers <input type="checkbox"/> MH/IDD Providers <input type="checkbox"/> Other (please specify): _____	Line of Business: <input checked="" type="checkbox"/> Medicaid <input type="checkbox"/> Other (please specify): _____ <input checked="" type="checkbox"/> Healthy Michigan _____ <input checked="" type="checkbox"/> SUD Block Grant <input checked="" type="checkbox"/> SUD Medicaid <input checked="" type="checkbox"/> CCBHC	Effective Date: <b>03/20/2023</b>

**Policy:** SWMBH and its participants CMHSPs shall work collaboratively to reduce the administrative burden on network providers by coordinating credentialing/recredentialing activities within the SWMBH Region and, to the extent practicable, with other Regions. SWMBH and its participant CMHSPs shall cooperate with the implementation and use of the MDHHS Universal Credentialing system, according to MDHHS’s implementation plan when it is released.

**Purpose:** To establish a consistent process for credentialing reciprocity in the SWMBH Region.

**Scope:** SWMBH Provider Network Management; Participant CMHSPs

**Responsibilities:** SWMBH Provider Network Management staff and Participant CMHSPs shall follow this procedure when accepting credentialing/recredentialing activities performed by another entity, with the exception of when participant CMHSPs rely on credentialing activities completed by SWMBH on behalf of the Region as a whole.

**Definitions:**

Shared Network Provider: a provider in SWMBH’s network that is contracted with two (2) or more participant CMHSPs.

Receiving CMHSP: a participant CMHSP that receives another participant CMHSP’s credentialing packet under credentialing reciprocity.



Credentialing CMHSP: a participant CMHSP that completes the credentialing process for a provider and shares its credentialing activities with other Region 4 participant CMHSPs.

**Procedure:**

**I. Tracking.**

- a. SWMBH and its participant CMHSPs shall maintain a spreadsheet of Region 4 shared network providers. The spreadsheet shall be reviewed annually, at minimum, by the Regional Provider Network Management Committee. Each shared network provider shall have a single participant CMHSP or SWMBH assigned to perform initial/recredentialing activities. For shared network providers physically located in another PIHP Region, the spreadsheet may indicate that local credentialing activities will be requested from the out of Region CMHSP or other PIHP where the provider is physically located.
- b. When SWMBH or a participant CMHSP completes credentialing activities for a shared network provider, they will upload the completed credentialing packet to the SWMBH Commons so it is available to the entire Region.

**II. In Region.**

**a. Completed by SWMBH.**

- i. When SWMBH performs certain credentialing activities on behalf of the entirety of Region 4.
- ii. Participant CMHSPs shall accept SWMBH's credentialing packet and credentialing decision, and shall not require providers already credentialed by SWMBH to go through the credentialing process again through the participant CMHSP.

**b. Completed by another Region 4 participant CMHSP.**

- i. A participant CMHSP shall verify whether another Region 4 participant CMHSP has already credentialed a provider. If so, the participant CMHSP (hereinafter "receiving CMHSP") shall obtain a copy of the completed credentialing packet from the SWMBH Commons, or shall request the credentialing packet directly from the participant CMHSP that completed the credentialing (hereinafter "credentialing CMHSP").
- ii. The receiving CMHSP shall make efforts to reduce the administrative burden on the shared network provider, the extent practicable.
- iii. If information requiring primary source verification is older than 180 days, the receiving CMHSP shall perform the primary source verification and document, as required.
- iv. The receiving CMHSP shall process the credentialing packet completed by the credentialing CMHSP the same as it would process a credentialing packet it had completed itself.
  1. If the credentialing packet received from the credentialing CMHSP meets the requirements to be a clean file, the receiving CMHSP may process it as such.



2. If the credentialing packet received from the credentialing CMHSP does not meet the requirements to be a clean file, or should the receiving CMHSP otherwise so choose, the receiving CMHSP may take the file to its credentialing committee.
- v. The receiving CMHSP shall make its own credentialing decision based on the credentialing packet and other appropriate information.
- vi. The receiving CMHSP shall notify the provider of its decision in the form, format, and within the timeframe(s) required under applicable Credentialing Policies.

### **III. Out of Region**

- a. SWMBH and its Participant CMHSPs may, but are not required to, request credentialing files from an out of Region CMHSP or another PIHP.
  - i. Completed out of Region credentialing packets shall be uploaded to the SWMBH Commons by the receiving entity.
- b. SWMBH or a receiving participant CMHSP shall follow the same procedure for processing a credentialing packet received from another participant CMHSP, as outlined in section II(b) above.
  - i. If SWMBH processes the out of Region credentialing packet, SWMBH's decision is applicable to the entire Region, as per section II(a) above.
  - ii. If a participant CMHSP processes the out of Region credentialing packet, its decision only applies to its network.

### **IV. Reciprocity and Negative Credentialing Action(s)**

- a. SWMBH retains the right to approve, suspend, or revoke/terminate from participation in the provision of Medicaid funded services, an organizational provider or individual practitioner in the Region 4 network (including participant CMHSP network providers), regardless of whether SWMBH or a participant CMHSP completed the credentialing activities.
- b. If a network provider's credentialing was completed and approved by SWMBH, and a participant CMHSP has identified threats to member health and/or safety, potential or actual contract/policy/regulatory violations, or other performance deficiencies that the participant CMHSP determines should be addressed through credentialing action, the participant CMHSP:
  - i. Shall make a referral to the SWMBH Credentialing Committee requesting SWMBH review the provider's credentialing status and provide information to SWMBH supporting the request for review.
    1. The referral shall be made within three (3) business days of the participant CMHSP's determination that the circumstances require credentialing action.
  - ii. May take any credentialing action the participant CMHSP determines necessary to protect member health and safety and address identified deficiencies, including instituting a precautionary suspension as outlined in



SWMBH Policy 02.09, but such action shall **not include** revocation of the subject provider's credentialing.

1. Since SWMBH approved credentialing on behalf of the Region, SWMBH must make a determination on revocation.
2. Nothing herein shall be construed to limit a participant CMHSP's ability to take contract action up to and including termination of a contract.

**References:**

SWMBH Policy 02.02 Credentialing & Re-Credentialing – Behavioral Health Practitioners  
SWMBH Policy 02.03 Credentialing & Re-Credentialing – Organizational Providers  
SWMBH Policy 02.09 Participating Provider Precautionary Suspension

**Attachments:** None



# P02.03.01 Credentialing Reciprocity

Final Audit Report

2023-03-31

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