

SWMBH Operating Policy 2.18

Subject: Ongoing Monitoring of Network Practitioners and Organizations		Accountability: Provider Network	Effective Date: 5/16/2016	Pages: 2
REQUIRED BY: BBA Section _____ PIHP Contract Section _____ NCQA: CR-6 _____ Other _____			Last Reviewed Date: 5/10/17	Past Reviewed Dates: 5/12/16
LINE OF BUSINESS: <input checked="" type="checkbox"/> Specialty Waiver (B/C) <input checked="" type="checkbox"/> 1115 Waiver <input checked="" type="checkbox"/> Healthy Michigan <input checked="" type="checkbox"/> SUD Medicaid <input checked="" type="checkbox"/> SUD Block Grant <input checked="" type="checkbox"/> OTHER: Medicare	APPLICATION: <input checked="" type="checkbox"/> SWMBH Staff and Ops <input checked="" type="checkbox"/> Participant CMHSPs <input type="checkbox"/> SUD Providers <input type="checkbox"/> MH / DD providers <input type="checkbox"/> Other: _____		Last Revised Date: 5/12/16	Past Revised Dates:
Approved: <u><i>[Signature]</i></u> Date: <u>5/18/17</u>		Required Reviewer: Director of Provider Network Management and Performance Improvement		

I. Purpose

To ensure ongoing monitoring of Southwest Michigan Behavioral Health (SWMBH) practitioner sanctions, complaints, and other potential quality concerns between re-credentialing cycles, and to outline how SWMBH will take action when areas of concern are identified.

II. Policy

SWMBH and entities with delegated provider network functions will monitor network practitioners and provider organizations on an ongoing basis for licensing sanctions and for general compliance with SWMBH credentialing policies and procedures in between credentialing cycles.

III. Standards and Guidelines

A. SWMBH and its delegates will monitor practitioners through the following methods:

1. The Michigan Department of Health and Human Services (MDHHS) Bureau of Health Professions Disciplinary Action Report (http://www.michigan.gov/mdch/0,1607,7-132-27417_27529-43008--,00.html) will be monitored monthly for disciplinary actions taken against SWMBH credentialed practitioners who are licensed and regulated in the State of Michigan. Staff will print, date, and initial this report to verify that it has been reviewed.
2. SWMBH Provider Network representatives will receive and track member complaints from the Customer Services Department at least every six months.
3. SWMBH Provider Network representatives will receive and track adverse events including sentinel events and critical incidents from the respective SWMBH Quality personnel at least every six months.
4. To ensure practitioners in the SWMBH network have renewed their Michigan licenses, any applicable certifications or accreditations, and liability insurance in a timely basis, the SWMBH Provider Network representatives will run a monthly report from SmartCare (or their local Managed Care Information System (MCIS) storing

SWMBH Operating Policy 2.18

credentialing information) to determine any provider or practitioner with a license, certification, accreditation, or liability insurance coming due for renewal.

- a. Providers and practitioners whose licenses are due for renewal will be checked for renewal status at <http://michigan.gov/healthlicense> .
 - b. Any provider or practitioner who has not renewed their license within applicable grace periods of its expiration will be immediately terminated from the provider network.
 - c. Providers and practitioners whose certifications, accreditations, or liability insurances are due for renewal will be contacted directed and asked to provide documentation of renewal.
5. The SWMBH Program Integrity / Compliance Department monitors practitioners monthly for Medicare/Medicaid exclusions per SWMBH Operating Policy 10.13. If a practitioner is listed as an excluded provider, the Program Integrity / Compliance Department will inform the Provider Network Department immediately. Any provider who has not renewed their license within applicable grace periods of its expiration will be immediately terminated from the provider network.

B. Follow up action on quality and licensing issues.

1. SWMBH's Provider Network representatives will present identified issues to their respective Credentials Committee. The committee, along with the Medical Director and Participating Providers, will assess the information and will take action if there is evidence of poor quality that could affect the health and safety of its members.
2. If a SWMBH provider or practitioner has been identified as out of compliance with SWMBH performance, quality, and/or licensing standards, SWMBH will reassess the practitioner's ability to perform the services that he or she is under contract to provide.
3. The Credentials Committee may:
 - a. Determine that no action is justified;
 - b. Issue a letter of guidance, warning, or reprimand;
 - c. Impose conditions for continued practice on the SWMBH provider network;
 - d. Impose a requirement for monitoring or consultation;
 - e. Recommend additional training or education;
 - f. Determine that the provider should be terminated for cause, as in the case of loss of license.
4. Providers and practitioners who are terminated for lapsed licensure or certification may reapply for participation at the discretion of the Credentials Committee once licensure or certification is renewed. Final approval of any provider or practitioner credentialing is at the discretion of the SWMBH Credentials Committee.

IV. Definitions

None

V. References

NCQA Credentialing and Re-credentialing CR-6

VI. Attachments

None