

<b>Sanford Health Plan</b>	<b>PR-006-Practitioner Credentialing Policy</b>
<b>CURRENT REVIEW:</b> 12/01/2018	<b>REVISION:</b> 12/01/2018
<b>WRITTEN BY:</b> Manager, Professional Practice	<b>APPROVED BY:</b> Sanford Health Plan Credentialing Committee

<b>SCOPE:</b>	All
<b>AFFECTED DEPARTMENT(s):</b>	Provider Relations, Provider Contracting, Credentialing, Medical Management
<b>IMPLEMENTED:</b> 01/01/98	<b>ISSUED:</b> 01/01/98
<b>REVIEW COORDINATOR:</b>	Manager, Provider Relations
<b>NCQA REVIEW:</b>	Yes-direct
<b>Provider Manual Publication</b>	Yes

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**REPLACES:** Conversion from PR-06 Practitioner Credentialing Policy

**VENDORS:**

- *Sanford Credentialing Services = Sanford Health Credentialing Department*

**RELATED POLICY(IES) –**

- **Sanford Health Plan**
  - MM-041
  - MM-056
  - MM-049
  - PR-006
  - PR-024
  - PR-025
- **ENTERPRISE**

**APPENDICES AND ATTACHMENTS -**

- **Sanford Health Plan**

**PURPOSE:**

To promulgate a policy related to practitioner credentialing

**POLICY:**

- (a) Nondiscrimination Policy  
 No Practitioner shall be denied Participating Practitioner status on the basis of gender, race, creed, color, ethnic/national origin, age, disability, sexual orientation or the types of procedures or patients in which the practitioner specializes.

- NOTICE -

25 Sanford Health Plan does not discriminate against particular practitioners that  
26 serve high-risk populations or specialize in conditions that require costly  
27 treatment. Sanford Health Plan monitors and prevents discrimination on an  
28 ongoing basis and at least annually. Monitoring and preventing is done by  
29 completing audits of denied files by the Director of Provider Relations. Also, all  
30 Credentialing Committee members will sign an affirmative statement to make  
31 decisions in a nondiscriminatory manner annually. Also, the Credentialing  
32 Committee is given only the practitioners name and specialty when reviewing the  
33 file. Gender, age, race, etc. is not given to the Committee at the time of reviewing  
34 the file therefore preventing discriminatory decisions.

35 (b) Rights and Duties of Participating Practitioner

36 The Practitioner shall only have such rights and duties as are set forth in the  
37 Practitioner's contract with the Plan and in other Plan policies and documents  
38 which are applicable to the Practitioner pursuant to said contract. Practitioners  
39 shall cooperate with Quality Improvement activities to improve the quality of care  
40 and services and member experience. Cooperation includes collection and  
41 evaluation of data and participation in the organization's QI programs.  
42 Practitioners shall also maintain the confidentiality of member information and  
43 records, and allow the Plan to use practitioner performance data.

44 (c) Burden of Providing Information

45 The Applicant shall always have the ultimate burden of producing adequate  
46 information for a proper evaluation of his or her competence, character, ethics and  
47 other qualifications, and of resolving any doubts about such qualifications. The  
48 Applicant shall also have the burden of providing evidence that all the statements  
49 made and information given on the application are factual and true. Until the Plan  
50 has received and verified all information requested by the Application, the  
51 Application will be deemed incomplete and will not be processed.

52 (d) Right to Inquire About Credentialing Status

53 Each contracted practitioner with the Sanford Health Plan retains the right  
54 to at anytime inquire about their credentialing status. The practitioner may  
55 contact any representative of the Sanford Health Plan Provider Relations  
56 department, and the Provider Relations department will contact Sanford  
57 Credentialing Services to obtain the exact status. The Provider Relations  
58 representative will then respond to the practitioner in a timely fashion with the  
59 information requested through the inquiry with regards to the status of their  
60 credentialing. The practitioner may be given the outstanding verifications. No  
61 peer related information will be shared.

62 (e) Right to Review

63 Practitioners will have the right to review the information submitted in support of  
64 their credentialing applications however, Sanford Health Plan respects the right of  
65 the Peer Review aspects that are integral in the credentialing process. Therefore,  
66 practitioners will not be allowed to review references, recommendations or any  
67 other information that is peer review protected. The information obtained from  
68 malpractice insurance carriers, state licensing boards, board certification  
69 verification, etc may be reviewed by the practitioner. In the event that through  
70 the review process a practitioner discovers an error in the credentialing file, the

71 practitioner does have the right to request a correction of the information in  
72 question.

73 (f) Right to Notification

74 Practitioners will be notified of any information obtained during the credentialing  
75 process that varies substantially from the information provided by the practitioner.  
76 Examples include but not limited to actions on licenses, malpractice claims  
77 history or board certification. The Credentialing Specialist will send written  
78 communication to the practitioner requesting clarification of the conflicting  
79 information. The practitioner will be given 10 business days to respond with a  
80 written or verbal explanation. If the discrepancy can be explained by the  
81 practitioner the file will continue to be processed. If the Credentialing Specialist  
82 feels the discrepancy was substantial the VP Medical Officer or Senior Director  
83 Medical Services will be notified to determine on how to proceed.

84 (g) Right to Correct Erroneous Information

85 Practitioners will have the right to correct erroneous information. The practitioner  
86 will be sent a written communication identifying the erroneous information and  
87 will be afforded ten (10) business days to provide corrected information. Sanford  
88 Health Plan will accept corrected information over the phone, in person, or via  
89 voice mail if it is related to employment/affiliation dates otherwise it must be a  
90 written response from the practitioner. Corrected information must be returned to  
91 the appropriate Credentialing Specialist who is processing the file. The  
92 Credentialing Specialist will document the receipt of corrected information in the  
93 practitioner's credentialing file and the credentialing database. Upon receipt of  
94 the corrected information from the practitioner, the new information will be  
95 incorporated into the credentialing process, and the new information will be  
96 verified through the appropriate Primary Source. The practitioner will again be  
97 informed if the information provided cannot be verified through a Primary  
98 Source. Until the discrepancy can be clarified and is verifiable through a Primary  
99 Source, the application is incomplete. Primary Source Verification will be used  
100 for the purpose of credentialing.

101 (h) Notification of Practitioner Rights

102 Practitioner rights are in the Provider Manual and in this policy PR-06  
103 Practitioner Credentialing Policy which both can be found on the Plan's website.

104 (i) Confidentiality

105 All information obtained in the credentialing process will remain confidential,  
106 except as otherwise provided by law. All staff that enters confidential  
107 information into Sanford Health Plan's information system is assigned passwords  
108 to prevent unauthorized staff from accessing screens containing confidential  
109 information. The department manager determines the level of authorized user  
110 access to data across the delivery system. The office is locked outside of business  
111 hours. Business hours are 8:00am to 5:00pm Monday – Friday. All visitors must  
112 report at the front desk and will be escorted throughout the office. (Refer to Code  
113 of Conduct, Compliance Enterprise policy)

114 Practitioner Credentialing Information – means that all information that is  
115 gathered either in the practitioner's credentialing application or through primary  
116 source verifications will be kept among only those people on the credentialing

117 staff and shared only with the Credentialing Committee, except where required by  
118 State and/or Federal laws. A practitioner may view their credentialing file upon  
119 request. Refer to Section 2 of this policy for detailed information of this process.  
120 Sanford Health Plan collaborates with Sanford Credentialing Services for  
121 exchange of data to ensure the protection of privacy and confidentiality.  
122

### 123 Section 3. Criteria

#### 124 (a) Eligibility

125 In order to be eligible to be considered as a Participating Practitioner, a  
126 Practitioner must meet the applicable criteria set forth in the Plan's Criteria for  
127 Participating Practitioners (Policy PR-010 Criteria for Participating Practitioners).  
128 The Credentialing Committee may, in its discretion, waive any of the criteria if it  
129 determines that to do so would be in the best interests of the Plan or its Covered  
130 persons. Practitioners are not published on the Sanford Health Plan directory until  
131 after Credentialing Committee approval.

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133 (b) For Iowa physicians: Insurance Division's Omnibus Bill, House File 2555. The  
134 bill has been signed by the Governor. Section 28 adds a new subsection 514F.6 to  
135 Iowa Code chapter 514, "Utilization and Cost Control," that reads as follows: The  
136 commissioner shall adopt rules to provide for the retrospective payment of clean  
137 claims for covered services provided by a physician during the credentialing  
138 period, once the physician is credentialed. For purposes of this section,  
139 "physician" means a licensed doctor of medicine and surgery or a licensed doctor  
140 of osteopathic medicine and surgery, and "credentialing period" means the time  
141 period between the health insurer's receipt of a physician's application for  
142 credentialing and approval of that application by the health insurer.  
143 "Credentialing" means a process through which a health insurer makes a  
144 determination based on criteria established by the health insurer concerning  
145 whether a physician is eligible to provide health care services to an insured and to  
146 receive reimbursement for the health care services provided under agreement  
147 entered into between the physician and the health insurer. "Clean claim" means  
148 the same as defined in section 507B.4A, subsection 2, paragraph "b."  
149

150 Sanford Health Plan has a process in place to hold claims for physicians that fall  
151 into this category. Once the physician has been approved, claims will be released  
152 for processing.

#### 153 (c) Obtaining Information from Hospital

154 When the Applicant is applying for or exercises clinical privileges at a  
155 Participating Hospital, the Plan has the option to request the hospital to provide  
156 copies of documents in the hospital's credentialing files that verify compliance by  
157 the applicant with the criteria set forth above. When this information is forwarded  
158 to the Plan with a certification by the hospital that the information has been

159 verified from the primary source of the information, the Applicant will not have to  
160 furnish the document in question. Any other information requested by the  
161 Application that is not so provided and verified by the hospital must be provided  
162 by the Applicant and verified from its primary source by the Plan.  
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165 **PROCEDURE:**

166 Scope of Clinical Practice

167 Each Participating Practitioner shall receive payment only for such clinical procedures  
168 specifically approved pursuant to this Credentialing Policy unless a special exception is  
169 made by the VP Medical Officer or Senior Director Medical Services. The approved  
170 scope of practice shall be based upon the applicant's relevant, recent education, training,  
171 experience, demonstrated competence and judgment, references and other relevant  
172 information, and conformance with Plan criteria regarding qualifications for performance  
173 of such procedures. The Practitioner shall have the burden of establishing his or her  
174 qualifications for and competences to exercise the scope of practice him or her requests.

175 Process and Procedure for Application

176 (a) Submission of Application

177 Applications shall be submitted on forms prescribed by the Plan. The Application  
178 shall be submitted by the Applicant to tSanford Credentialing Services. After  
179 collecting current certificate of insurance and other information or materials  
180 deemed pertinent, the Plan shall determine the Application to be complete and  
181 credentialing process may begin.

182 The application includes:

- 183 (1) Reasons for any inability to perform the essential functions of the position,  
184 with or without accommodation;
- 185 (2) Lack of present illegal drug use;
- 186 (3) History of loss of license and felony convictions;
- 187 (4) History of loss or limitation of privileges or disciplinary activity;
- 188 (5) Current malpractice insurance coverage and
- 189 (6) The correctness and completeness of the application.

190 The attestation must be signed and dated within 180 days from the Credentialing  
191 Committee decision date. Signature stamps are not accepted unless the  
192 practitioner is physically impaired. The disability will be documented in the  
193 practitioner's credentialing file allowing the stamp signature to be accepted.

194 (b) Verification Procedure

195 (1) Verification process: verifications must be completed within 180 days of  
196 the Credentialing Committee decision date from one of the following sources: the  
197 primary source, a contracted agent of the primary source or another NCQA  
198 accepted source listed for the credential. License and DEA must be current at the  
199 time of Committee decision.

200 Appropriate documentation for primary source verifications:

- 201 (a) All verifications will be printed and placed in the practitioners  
202 credentialing file or the verifications will be scanned into the  
203 credentialing system. The verifications are also entered into the  
204 credentialing system and which identifies the person that verified  
205 the document and the date. Our system will automatically print an

- 206 electronic signature for some of the primary source verifications  
207 from websites which will include the staff member verifying the  
208 information, date, source and report date, if applicable.
- 209 (b) Oral or verbal verification – the Credentialing Specialist who  
210 verified the credentials must date, sign or initial and note the  
211 credentialed verified if it is not in the electronic system. Written  
212 verification – the date of the letter or report is used to assess  
213 timeliness of the verification. The Credentialing Specialist will  
214 initial and date stamp the receipt of the verification if it is not in  
215 the electronic system.
- 216 (c) Internet or electronic verification – The date generated by the source  
217 when the information is retrieved is the verification date. If the  
218 source does not list a date, the date will be the person verifying the  
219 information. The Credentialing Specialist who verifies the  
220 credentials must sign/initial and date the verification if the  
221 information is not generated by electronic source or automated by  
222 the computer system and if it is not in the electronic system.
- 223 (d) Pencils will not be used for credentialing documentation.  
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226 The information supplied by the applicant shall be primary source verified, placed  
227 in the applicant’s file either paper or electronic and documented in the  
228 credentialing system as follows:

- 229 1. Valid, current state licensure in each state that the practitioner  
230 provides care for the Plan’s members. The state licensure is  
231 primary source verified directly with the state licensure board by  
232 letter, phone, fax or via state web site. The Credentialing  
233 Specialist will verify whether there are state sanctions, restrictions  
234 or limitations on the practitioner’s scope of practice with the  
235 licensing agency.
- 236 2. Current Federal DEA in each state in which the practitioner  
237 practices in regards to Plan’s members or a signed Sanford Health  
238 Plan waiver indicating why the practitioner does not need a state  
239 specific Federal DEA. The Federal DEA will be primary source  
240 verified through NTIS, phone verification or inspection of current  
241 copy. CSR certificate will be verified via current copy, phone  
242 verification, email or website of the CSR certificate, if applicable,  
243 in each state the practitioner practices in regards to the Plan’s  
244 members. Please refer to a copy of the Sanford Health Plan  
245 Waiver for Controlled Substances/Federal DEA/State Controlled  
246 Substances.  
247 A practitioner that has a pending DEA or CSR, may be approved if  
248 the practitioner submits a letter stating what practitioner will write  
249 all prescriptions requiring a DEA or CSR number until the  
250 practitioner has a valid DEA or CSR certificate.
- 251 3. Medical/professional school education, residency training or board

252 certification verified depending on the highest level achieved. The  
253 Plan verifies the highest level achieved. Medical/professional  
254 school and residencies will be primary source verified by letter,  
255 phone or fax directly with the institution and/or by the AOA  
256 (American Board of Osteopathic Association) or the AMA  
257 (American Medical Association). Education/training beyond  
258 residency will be verified if the applicant is practicing in that  
259 specialty unless they are board certified. If they are board certified  
260 in that specialty, we will verify the board certification. The Plan  
261 may obtain at least annually, written confirmation from the state  
262 licensing agency, specialty board or registry stating the entity  
263 performs primary source verification of practitioner education and  
264 training.

- 265 4. Board certification status will be primary source verified by the  
266 American Board of Medical Specialties or an official ABMS  
267 display agent via website, letter, fax, or telephone . Board  
268 certification can also be verified by the AMA, AOA or  
269 confirmation from the appropriate specialty board by letter, phone,  
270 website or fax. Expiration date must be present with the  
271 verification and noted in the credentialing system. If an expiration  
272 date is not provided by the Board, the Plan will verify and  
273 document that the board certification is current within 180 days of  
274 the credentialing approval date. Board certification will be verified  
275 at recredentialing including lifetime certifications. Board  
276 certification is not required by the Plan.
- 277 5. ECFMG (if applicable) primary source verified directly with the  
278 Educational Commission for Foreign Medical Graduates by letter,  
279 fax or website electronic verification.
- 280 6. Hospital affiliations and the primary admitting facility will be  
281 gathered from the credentialing application provided by the  
282 practitioner as applicable.
- 283 7. Work History
  - 284 i. For Initial Credentialing a minimum of five-year relevant work  
285 history must be provided on the application. Any time gaps  
286 exceeding six months will require an explanation via letter, phone  
287 or fax. Any gaps over a year must be explained by the practitioner  
288 in writing. All work history must have a month and year  
289 beginning date and month and year end date. If the practitioner  
290 has practiced fewer than five years the relevant work history  
291 begins at the time of initial licensure. A time gap report is ran out  
292 of the credentialing system to verify any time gaps. The  
293 credentialing specialists will initial and date the report.
  - 294 ii. For Recredentialing a work history (from previous approval  
295 date) to verify any gaps in history exceeding six months will  
296 require an explanation through letter, phone or fax. Any gaps  
297 exceeding one year will need to be verified in writing by the

- 298 practitioner.
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- 300 8. Malpractice History primary source verified in writing for the past
- 301 five years from either the NPDB or the malpractice carrier. If
- 302 during the five years the practitioner was covered by a hospital
- 303 insurance policy during a residency or fellowship, confirmation
- 304 will not be obtained.
- 305
- 306 9. Present professional liability coverage is supplied in the form of a
- 307 photocopy of the Certificate of Insurance requested from the
- 308 applicant. Current professional liability insurance information is
- 309 also requested within the application. The coverage limits and
- 310 effective and expiration dates must be present. If the practitioner is
- 311 covered under a federal tort policy, a copy of the letter or
- 312 attestation from the provider of the federal tort coverage will be
- 313 accepted.
- 314 10. Medicare/Medicaid sanctions primary source verified through
- 315 report from National Practitioners Data Bank and EPStaff Check.
- 316 The EPStaff Check contract verifies the following databases:
- 317 - Iowa Medicaid Provider Sanctions List
- 318 - Minnesota Excluded Providers
- 319 - North Dakota Medicaid
- 320 - Office of Inspector General – List of the Excluded
- 321 Individuals/Entities
- 322 - Office of Inspector General – Most Wanted Fugitives
- 323 - System for Award Management Excluded Parties
- 324 - Office of Foreign Assets Control
- 325 - Wyoming Medicaid Sanctioned Providers
- 326 - Montana Medicaid Exclusions (Refer to Policy PR-24
- 327 Monitoring Policy)
- 328 11. Sanctions, limitations, restrictions on licensure primary source
- 329 verified with state medical board or other licensing agency, as
- 330 appropriate, Federation of State Medical Boards or the NPDB. All
- 331 state licenses will be queried for the recent five year look back
- 332 period. (Refer to Policy PR-24 Monitoring Policy)

333 In addition, the following databases shall be queried as appropriate:

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- National Practitioner Data Bank.
  - Department of Professional Regulations (if available).
  - State Board of Chiropractic Examiners or the Federation of Chiropractic Licensing Boards.
  - State Board of Dental Examiners.
  - State Board of Podiatric Examiners.
  - Federation of State Medical Boards.
  - State licensure or certification board
  - Medicare Opt Out websites for practitioners practicing in South Dakota, Minnesota, North Dakota and Iowa



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- Social Security Death Master File
- National Plan and Provider Enumeration System (NPI Registry)

12. Once all verifications have been received, the file is reviewed by a Credentialing staff member to ensure the verifications are within the appropriate timeframe, to review the file against the established criteria to determine if it is a clean or non clean file and to verify the file is complete.

(c) Credentialing Committee

(1) The Credentialing Committee is facilitated by the VP Medical Officer or the Senior Director Medical Services. The committee is made up of participating practitioners with a variety of different specialties. (refer to Policy PR-18 Credentialing Committee Policy) During the meetings, only the Committee Practitioner Members discuss and vote on the participation status of each “unclean” practitioner. The Credentialing Committee shall examine the evidence of the character, professional competence, qualifications, prior behavior and ethical standing of the applicant and shall determine, through information contained in references given by the applicant, through verifications and from any other sources available, whether the applicant meets all of the necessary qualifications for a Plan contract to perform the clinical procedures requested. The Committee may decide to alter a decision. For example, the Committee may decide on a one year recredentialing cycle, may require the practitioner to take continuing education, require supervision for a recommended period of time, etc.

(2) During the Recredentialing cycle, the Committee shall review those qualities above as well as additional factors including, but not limited to Quality complaints and adverse events. The VP Medical Officer or Senior Director Medical Services will review information available from the Quality improvement program relative to the Participating Practitioner, when available and will make a recommendation.

(d) Decision Process

(1) Not later than 180 days from its receipt of the completed Application, the Credentialing Committee shall approve or disapprove the Application and shall make a written report with respect to the applicant to the Plan’s Board, through the VP Medical Officer or Senior Director Medical Services. The Committee receives a report of “clean” and all “unclean” files. Each “unclean” file is reviewed by the Committee to determine that the practitioner meets the above qualifications. The Committee will decide whether to approve or disapprove the practitioner by majority vote. A “clean” file is determined as there was no information found throughout the verification process in which the Committee would need to review based off the credentialing criteria found in policy PR-010. As for an “unclean” file, information was obtained that the Committee would need

390 to review as the file did not meet the established criteria or issues were  
391 discovered. (See policy PR-10 for specific criteria) Examples include but  
392 not limited to: malpractice claims, peer reference unsatisfactory, OIG or  
393 NPDB with information on the report or health status that may limit or  
394 enable a practitioner to perform his/her specific duties. The VP Medical  
395 Officer or Senior Director Medical Services has the authority to determine  
396 that a file is “clean” and may sign off on it as complete, clean and  
397 approved which is considered the committee review date. The VP  
398 Medical Officer or Senior Director Medical Services may use a  
399 handwritten signature or handwritten initials as documentation of sign-off;  
400 an electronic signature will not be accepted.

- 401 (2) If the recommendation of the Credentialing Committee is delayed longer than  
402 180 days, the VP Medical Officer or Senior Director Medical Services  
403 shall send a letter to the Applicant, VP Medical Officer. If for any reason  
404 a primary source verification becomes older than 180 days, re-verification  
405 will be completed.
- 406 (3) If the Credentialing Committee recommends that an Application be denied  
407 for stated reasons based on the clinical competence or professional  
408 conduct of the Applicant, the Applicant may request a hearing pursuant to  
409 the Plan’s Hearing Procedures, and all subsequent actions shall be  
410 governed by those procedures. Said procedures shall comply with the  
411 minimum due process requirements set forth in the Federal Health Care  
412 Quality Improvement Act of 1986. (Refer to Policy PR-15 Provider  
413 Appeal Rights)
- 414 (4) The Credentialing Committee may decide to pend an Application to ask the  
415 practitioner for additional information. In this case, the VP Medical  
416 Officer or Senior Director Medical Services or designated credentialing  
417 staff member will send a letter to the Applicant requesting the additional  
418 information. The Applicant will be given 30 days to supply additional  
419 information. The new information will be included in the original file  
420 which is brought back to the next Credentialing Committee meeting.
- 421 (5) The decisions on appointment made by the Plan’s Credentialing Committee  
422 are approved by the Sanford Health Plan Board of Director’s.
- 423 (6) The Sanford Health Plan does not conduct Provisional Credentialing.
- 424 (7) The Sanford Health Plan Provider Relations Department will send  
425 a letter notifying the practitioner of his/her credentialing/recredentialing  
426 decision within ten (10) business days of the Committee’s decision. In  
427 case of a denial, the VP Medical Officer or Senior Director Medical  
428 Services will send the letter.

429  
430 Section 6. Recredentialing Cycle Length

- 431 (a) Each Participating Practitioner shall be responsible for providing the Plan with  
432 updated information at least every three years pertaining to his or her credentials.  
433 Practitioners must be recredentialed at least within 36 months from previous  
434 credentialing date.  
435

436 (b) Sanford employed practitioners: All efforts will be made to maintain the  
437 credentialing and recredentialing schedules of the Practitioner's primary admitting  
438 facility. This way the Practitioner only needs to complete one application every  
439 two years for all facilities of Sanford Health that they participate with.  
440

441 Section 7. Procedure for Clean File Review

442 (a) Sanford Credentialing Services will run a weekly report of clean files that  
443 are at Committee status. The designated person will review all profiles to confirm  
444 each file has meet the Plan's clean criteria, is complete and ready for the VP  
445 Medical Officer or Senior Director Medical Services to review. The VP Medical  
446 Officer or Senior Director Medical Services will review and if approves will sign  
447 off on the full clean list. Minutes will be created, listing those practitioners  
448 approved.  
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450 Section 8. Discontinuation of Participating Practitioner Status for Reasons Related to Clinical  
451 Competence or Professional Conduct

452 (a) If the Plan has determined to discontinue a Practitioner's participating status after  
453 recredentialing for stated reasons based on the clinical competence, professional  
454 conduct, and/or quality deficiencies of the Practitioner, the Practitioner shall be  
455 notified in writing of the decision and the reasons for it. The Practitioner may  
456 request a hearing pursuant to the Plan's Hearing Procedures, and all subsequent  
457 actions pertaining to the contract termination or non-renewal shall be governed by  
458 those procedures. Said procedures shall comply with the minimum due process  
459 requirements set forth in the Health Care Quality Improvement Act of 1986.  
460 (Refer to PR-15 Provider Appeal Rights Policy).  
461 (b) Whenever termination or non-renewal is based on the clinical competence or  
462 professional conduct of the practitioner, reports of the action will be made to  
463 appropriate federal or state authorities as required by law.  
464 (c) Applicants are notified of their appeal rights through the Provider Manual which  
465 is available on our website. The Provider Appeal Rights Policy would be sent  
466 along with the termination letter to the practitioner.  
467

468 Section 9. Procedure Relating to Practitioner Dispute Resolution

469 (a) If a Participating Practitioner has a grievance, complaint or other problem  
470 regarding any aspect of the Plan's operations (other than one relating to  
471 Participating Practitioner status or preadmission, admission and continued stay  
472 denials) while under contract with the Plan, the Practitioner may contact the  
473 Plan's Director of Provider Relations to discuss the matter.  
474 (b) If the matter cannot be resolved informally within a reasonable time to the  
475 Practitioner's satisfaction, the Practitioner may submit a written grievance to an  
476 ad hoc Dispute Resolution Committee, which shall be appointed by the Director  
477 of Provider Relations of the Plan. The Committee shall be composed of three  
478 individuals, including at least two other Participating Practitioners who are not  
479 associated in practice or in economic competition with the practitioner bringing  
480 the grievance. The Committee shall consider the matter as soon as practicable  
481 after its receipt of the grievance, conduct such investigation of the grievance as

482 may be necessary, and recommend such corrective action (if any) as it deems  
483 appropriate to the Board.  
484 (c) The Board shall take such action, as it deems appropriate upon receipt of the  
485 recommendation of the Committee. The Practitioner shall be notified of the  
486 disposition of the grievance and any corrective action taken with respect to the  
487 grievance. The decision of the Board shall be final and binding on both the Plan  
488 and the Practitioner.  
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#### 490 Section 10: Delegated Credentialing

491 The Plan will in certain circumstances enter into the process of delegating  
492 the credentialing and recredentialing responsibilities to large practitioner groups  
493 and/or rental networks. In such cases, the Plan follows the NCQA guidelines  
494 along with any relevant State regulations, including regulations issued by the  
495 Board of Registration of Medicine at 243 CMR 3.13 in regards to delegation. A  
496 complete pre assessment and file review of the organization would be completed  
497 and reviewed against the NCQA standards along with any relevant State  
498 regulations as specified above. If the organization meets the necessary standards  
499 a delegation agreement would be offered. The agreement would indicate what  
500 standards that would be delegated which may include all NCQA standards CR 1 –  
501 8 which would be based off of those elements passing the pre-assessment review.  
502 The Plan retains the responsibility for ensuring that all credentialing functions are  
503 being performed according to the Plan’s expectations and NCQA standards. For  
504 further explanation on Delegated Credentialing refer to Policy PR-25 Delegated  
505 Credentialing Process. Sanford Health Plan does currently have delegated  
506 agreements in place.

#### 507 Section 11: Practitioner Termination and Reinstatement

508 If the Plan should terminate a practitioner and then later want to reinstate a  
509 practitioner the practitioner will have to go through initial credentialing if the  
510 lapse was more than 30 calendar days.  
511

#### 512 Section 12: File Retention

513 Sanford Credentialing Services will keep all initial credentialing and  
514 recredentialing files for each practitioner credentialed. If a practitioner should  
515 leave the Plan’s network the whole credentialing file will be scanned or sent off  
516 site to Record Keepers. If scanned, the paper file will be shredded appropriately.  
517

#### 518 **FLOW DIAGRAM (Attachment A)**

#### 519 **WORK INSTRUCTIONS:**

#### 520 **DEFINITIONS:**

- 521
- 522 (a) “Applicant” means a practitioner who has submitted an initial application to  
523 participate as a Participating Practitioner with the Plan or a Recredentialing  
524 Application with the Plan.
  - 525 (b) “Application” means an initial or recredentialing application.
  - 526 (c) “VP Medical Officer” or “Senior Director Medical Services” means the  
527 physician(s) directly responsible for facilitating the credentialing process and  
528

- 529 during the committee meetings. The VP Medical Officer or Senior Director  
530 Medical Services has the authority to sign off on “clean” files. The VP Medical  
531 Officer or Senior Director Medical Services submits a report and verbal  
532 recommendation to the Board in circumstances of non-renewals.
- 533 (d) “Covered Services” means those medically necessary health services to which  
534 Covered persons are entitled under a health agreement when provided or  
535 authorized in accordance with Plan Policy.
- 536 (e) “Member” means any individual who is covered by the Plan.
- 537 (f) “Health Care Services” mean any procedures, diagnoses, facilities or supplies  
538 furnished to a human being for the treatment of illness or injury.
- 539 (g) “Health Contract” means a contract whereby the Plan agrees to provide  
540 comprehensive health services to Covered persons.
- 541 (h) “Participating.” All Practitioners are either “Participating” or “Non-  
542 Participating.”
- 543 (i) “Participating” means that the Practitioner or someone on the  
544 Practitioner’s behalf has signed a contract with the Plan to provide  
545 services to Covered persons and has been approved by the Credentialing  
546 Committee.
- 547 (ii) “Non-Participating” means that the Practitioner has not signed such a  
548 contract with the Plan.
- 549 (i) “Physician” means an individual licensed to practice medicine or osteopathy in  
550 any state where the Plan is legally authorized to operate.
- 551 (j) “Practitioner” means any individual or group of individuals licensed to practice  
552 the healing arts in any state where the Plan is legally authorized to operate. This  
553 includes physicians, podiatrists, psychologists, chiropractors, optometrists, speech  
554 pathologists, occupational therapists, audiologists, physical therapists. MSWs,  
555 Ed.Ds, physician assistants, nurse practitioners, nurse midwives, nurse  
556 anesthetists, dentists.
- 557 (k) “Practitioner Group” shall mean a partnership, professional corporation, nonprofit  
558 corporation or other entity that employs or contracts with Practitioners and in turn  
559 enters into a contract with the Plan to provide Covered Services to Covered  
560 persons.
- 561 (l) “Primary Care Physician” means a family practice physician, internist,  
562 pediatrician, or obstetrician/gynecologist who is a Participating Practitioner and  
563 has chosen to be designated as a Primary Care Physician as indicated in the  
564 Provider Directory and who may be responsible for providing, prescribing,  
565 directing and/or authorizing all care and treatment required by Covered persons.
- 566 (m) “Provider” hospital or any other institution that furnishes health care services and  
567 is licensed or otherwise authorized to render such services in any state where the  
568 Plan is legally authorized to operate.
- 569 (n) “The Plan” shall mean Sanford Health Plan.

570  
571 **REFERENCES**

- 572 NCQA Standard QI 3, CR 1, CR 2, CR 3, CR 4  
573 Medicaid Expansion 42 CFR Standards 438.214  
574 Medicaid Expansion 42 CFR 438.214 Provider Selection  
575 Medicaid Expansion 42 CFR 438.230 Subcontractual Relationships and Delegation

576 Minnesota Administrative Rule 4685.1110 Subp. 11 Provider Selection and Credentialing

577

578 **POLICY IS SUBJECT TO THE FOLLOWING AUDITS:**

579

- NCQA

580

- NDME-External Quality Review Organization (EQRO)

581

- Minnesota Department of Health

582

- CMS for Marketplace

583

**EXTERNAL PROGRAM REVIEWER:** N/A

584

**PUBLICATION or WEB PRESENTATION:**

585

Published in Manual and Portal