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North Sound Behavioral Health Organization

Section 1000 – Administrative: Primary Source Verification Credentialing, Re-Credentialing, Appointment and Privileging of Contracted or Employed Staff

Authorizing Source: 42 CFR 438-214

Cancels:

See Also:

Providers must comply with this policy and may develop Implementation guidelines as needed

Responsible Staff: Contracts Manager

Approved by: Executive Director

Date: 3/8/2017

Signature:

POLICY #1007.00

SUBJECT: PRIMARY SOURCE VERIFICATION CREDENTIALING, RE-CREDENTIALING, APPOINTMENT AND PRIVILEGING OF CONTRACTED OR EMPLOYED STAFF

PURPOSE

The purpose of this policy is to provide guidelines and instructions for the process of credentialing/re-credentialing, appointment and privileging, through such activities as verifying current registration, licensure, relevant education, background clearance, training, experience and competence to meet position qualifications for North Sound Behavioral Health Organization (North Sound BHO) contracted or employed staff providing direct care services to and/or clinical oversight of North Sound BHO enrollees. This policy also establishes the standards for North Sound BHO network providers' credentialing/re-credentialing, appointment and privileging programs.

POLICY

To ensure all North Sound BHO contracted or employed staff who provide direct care to and/or clinical oversight of North Sound BHO enrollees meet the standards for the relevant job functions and ensure their credentials are confirmed through primary source verification.

To provide for appointment and privileging of North Sound BHO contracted or employed staff who provide direct care to and/or clinical oversight of North Sound BHO enrollees and whose job function requires them to exercise significant independent judgment and clinical responsibility. The appointment process will require additional credentialing/re-credentialing steps and privileging.

To ensure North Sound BHO Network Providers have and enforce their own policies and procedures governing credentialing, re-credentialing, appointment and privileging which substantially comply with the procedures set forth in this policy.

To establish a process for monitoring of the credentialing, re-credentialing, appointment and privileging activities of North Sound BHO Network Providers.

DEFINITIONS

Credentials

Documented evidence of registration, licensure, education, background clearance, training, experience and/or other qualifications.

Credentialing

The process of assessing and validating the qualifications of a registered and/or licensed individual.

Criteria

Expected levels of achievement or specification against which performance can be assessed.

Current Competence

Verification of abilities and experience, in writing, by individuals personally acquainted with the person's professional and clinical performance.

Privileging

A process whereby an individual is formally granted permission to perform specific duties and job functions as defined in clinical privileges or job descriptions based on the individual's qualifications, experience, education, background clearance, training and credentials.

Primary Source Verification

The process of validating stated credentials from their original source.

Re-credentialing

The process whereby the credentialing information is updated.

PROCEDURES

- A. North Sound BHO ensures criteria is validated in the following manner for all contracted or employed staff who provide direct care to and/or clinical oversight of North Sound BHO enrollees:
 1. Applicants sign a statement attesting to the accuracy and completeness of all information and consenting to inspection of records and documents pertinent to the application.
 2. All applications are screened to confirm that the minimum requirements for the job functions are met prior to hire.
 3. All applicants are subject to a criminal background check, per RCW Chapter 43.43. 830-832, through the Washington State Patrol for employees and volunteers of the Contractor who may have unsupervised access to children, people with developmental disabilities, or vulnerable adults.
 4. Information submitted on applications that is essential to the functions of the job (i.e., licensure, training and experience) is confirmed through primary source verification. Additional data is requested where relevant to the functions of the job to be performed (i.e., Drug Enforcement Agency [DEA] certificate for jobs requiring prescriptive authority) and is confirmed through primary source verification.
 5. The applicant will be responsible for requesting certified copies of academic credentials and certificates of insurance when required.

6. Re-credentialing activities are performed at a minimum, every two (2) years. Steps to be taken shall include primary source verification of information submitted on initial application, which is subject to change (i.e., expiration of a required license).
7. The competence of all contracted and employed staff who provide direct care to and/or clinical oversight of North Sound BHO enrollees is assessed, maintained and improved on an ongoing basis through the development and implementation of a training plan that is pertinent to each position.

B. Appointment and Privileging Process:

North Sound BHO shall provide for the appointment and privileging of contracted or employed staff who provide direct care to and/or clinical oversight of North Sound BHO enrollees and whose job function requires them to exercise significant independent judgment and clinical responsibility. All steps taken in the appointment process will be in addition to the steps required above.

1. Prior to appointment:

- a. Applicant's current registration, licensure and/or certification are verified from the primary source where claimed and relevant to the functions of the job to be performed.
- b. Successful completion of a course of study is verified from the primary source, where claimed and relevant to the functions of the job to be performed.
- c. Experience is verified from the primary source, where claimed and relevant to the functions of the job to be performed.
- d. Information about involvement in professional liability actions is verified and good standing is confirmed where relevant to the functions of the job to be performed.
- e. When information from a primary source is not available, a reliable secondary source is used. The attempt to contact the primary source is documented.
- f. Criminal background check is completed.

2. Provisional Appointment:

- a. When information is available but not yet received from the primary source the applicant may be appointed for a provisional period.
- b. During this provisional period, the applicant will complete an orientation designed to promote safe and effective performance of their job responsibilities by their supervisor.

3. Primary Source Verification Received:

- a. Primary Source Verification of criteria is provided to the Appointment and Privileging parties and then placed in the contracted or employed staff's credential file. Any discrepancies may be grounds for termination.

- b. Once appointment and privileging have occurred in accordance with subsection B, a provisional period is changed to a probationary period. The provisional period and probationary period will equal a minimum of six (6) months from the date of appointment/hire. At the end of the period, a performance appraisal will be conducted.
- 4. Appointment/privileging activities are performed at a minimum, every two (2) years.

C. North Sound BHO

- 1. North Sound BHO appointed staff shall be responsible for:
 - a. Review credentialing/re-credentialing files;
 - b. Ensure background checks have been completed on staff;
 - c. Assess the individual's ability to meet performance expectations as defined in clinical privileges or job descriptions;
 - d. Document competency assessment activities;
 - e. Recommend to North Sound BHO Medical Director or their designee or Clinical Director whether or not appointment should be made and the specific privileges that may be granted to an individual under consideration for initial or renewed employment or contract; and
 - f. Act as a Peer Review Committee, if necessary.
- 2. North Sound BHO will retain and have access to the credentialing, appointment and privileging files of North Sound BHO contracted or employed staff in accordance with state and federal laws governing access to credentialing/re-credentialing files and laws regarding quality management and peer review confidentiality and privileging guidelines and requirements.

D. Responsibilities of the North Sound BHO Network Providers:

Network Providers have and enforce their own policies and procedures governing credentialing/re-credentialing, appointment and privileging which substantially comply with the procedures set forth in this policy.

- 1. Network Providers retain and have access to the credentialing files of the contracted or employed staff in accordance with state and federal laws governing access to credentialing/re-credentialing files and laws regarding quality management and peer review confidentiality and privileging guidelines and requirements.
- 2. Network Providers perform timely background checks on all employees.
- 3. Network Providers perform credentialing/re-credentialing, appointment and privileging activities in accordance with their policies and procedures that substantially comply with the procedures set forth in this policy.

4. Network Providers will report to North Sound BHO Quality Manager or designee any individual reports of change in licensure or certification status and/or any adverse actions.
5. Exceptions will be granted to the requirement of substantial compliance upon a showing the Network Provider's program meets generally accepted industry standards.

E. North Sound BHO Monitoring Responsibilities

1. North Sound BHO retains responsibility for oversight and monitoring of the credentialing/re-credentialing, appointment and privileging processes and associated activities performed by Network Providers.
2. North Sound BHO ensures background checks have been completed on all provider employees.
3. North Sound BHO shall review Network Providers existing and/or new policies and procedures related to credentialing/re-credentialing, appointment and privileging during its administrative review.
4. North Sound BHO retains the ability to review at any time credentialing/re-credentialing files for purposes of quality management oversight. At a minimum, North Sound BHO will periodically conduct a review of Network Providers' credentialing/re-credentialing processes and files.

ATTACHMENTS

None