



Section 3.20 **Credentialing and Recredentialing**

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3.20.1 **Introduction**

The credentialing and recredentialing processes are integral components of the Arizona Department of Health Services/Division of Behavioral Health Services (ADHS/DBHS) quality management program. The credentialing and recredentialing processes help to ensure that qualified behavioral health providers, who are capable of meeting the needs of the persons who are seeking and/or receiving behavioral health services, participate in the ADHS/DBHS provider network.

Credentialing and recredentialing is an ongoing review process to assure the current competence of practitioners by validating the training and competence of individual practitioners in particular specialty areas. This level of review is intended to provide verification that the appropriate training, experience, qualifications, and ongoing competence has been demonstrated by individual practitioners for the services they provide.

The credentialing and recredentialing requirements differ depending on the type of provider. Physicians, nurse practitioners, physician assistants, psychologists and all other behavioral health professionals who are registered to bill independently or provide behavioral health services for which they are licensed to perform must be credentialed prior to providing services in the ADHS/DBHS behavioral health system.

The specific requirements associated with the credentialing and recredentialing processes for each type of provider are discussed below.

The objectives of the credentialing and recredentialing processes are to:

- Maintain fair credentialing and recredentialing processes in which standards are applied consistently throughout the state;
- Obtain application information about a potential provider's background and work history;
- Verify credentials and other information (e.g., malpractice or sanction activity) with primary sources; and

Provide flexibility in the process (i.e., expedited credentialing) so that any gaps in service within provider networks can be expeditiously addressed.

3.20.2 **Terms**

Definitions for terms are located online at www.narbha.org or <http://www.azdhs.gov/bhs/definitions/index.php>.



The following terms are referenced in this section:

[Behavioral Health Professional](#)
[Behavioral Health Technician](#)
[Credentialing](#)
[Independent Licensed Practitioners](#)
[Primary Source Verification](#)
[Temporary/provisional credentialing](#)

3.20.3 Procedures

General process for credentialing

Responsible Entity. NARBHA or its designee must establish credentialing and recredentialing processes that are in compliance with the standards set forth in this section.

Effective July 15, 2010, NARBHA credentials all behavioral health professionals who are registered with AHCCCS to bill independently before those individuals are entered into NARBHA provider contracts.

Behavioral Health Professionals who are registered with AHCCCS to bill independently complete the NARBHA Credentialing Application [NARBHA PM Form 3.20.1 – Credentialing Application – Practitioners](#) and forward the completed application to the NARBHA Credentialing Unit.

Please review the Category of Service (COS) requirements for practitioners when registering practitioners with AHCCCS as well as the B-2 matrix of the Covered Behavioral Health Services Guide which lists the Categories of Service required for certain billing codes. Some providers will require category of service 47 to bill behavioral health services. Other practitioners such as MDs, DOs, PAs and NPs may or may not require it depending on what services they anticipate billing.

Please make sure to review any scope of practice requirements (if applicable) for the practitioner being credentialed/recruited to ensure that the practitioner is/will be practicing within his/her scope of practice.

The NARBHA Credentialing Unit will ensure that primary source verification is completed on the applicant, as required in this policy. The NARBHA Credentialing Committee will review a summary of all credentialing applications. The NARBHA Credentialing Committee will approve applicants that meet the requirements contained in this policy. Once an applicant is credentialed by NARBHA, NARBHA shall enter the individual into the appropriate NARBHA contract.

The Provider or applicant has the right to appeal a credentialing decision made by NARBHA according to the “Contract Claims” requirements set forth in the Uniform Terms and Conditions portion of the NARBHA Provider contract. The “Contract Claims” portion of the NARBHA Provider contract requires all contract claims or controversies to be resolved according to A.R.S. Title 41, Chapter 6, Article 6 and Article 10, and rules adopted thereunder. Please refer to [PM Attachment 3.20.1 NARBHA Desktop Protocol for Credentialing Appeals](#) to file an appeal with NARBHA regarding a credentialing decision.



In order to ensure there is not any jeopardy posed to the validity of the credentialing process, NARBHA shall, on at least an annual basis, ensure that all committee members have disclosed in writing, that they do not have any conflicts of interest that could pose a risk to the validity of the credentialing process.

Accreditation by a nationally recognized accreditation organization. Accreditation by a nationally recognized accreditation organization will meet ADHS/DBHS credentialing and recredentialing standards. NARBHA must ensure, to the extent possible, that providers are not subjected to duplicative credentialing processes.

Fairness of Process. NARBHA or their designee shall maintain fair credentialing and recredentialing processes which:

- Does not discriminate against a provider solely on the basis of the professional's license or certification; or due to the fact that the provider serves high-risk populations and/or specializes in the treatment of costly conditions;
- Affords the provider the right to review information gathered related to his/her credentialing application and to correct erroneous information submitted by another party. The organization is not required to reveal the source of information if the information is not obtained to meet organization credentialing verification requirements or if disclosure is prohibited by law;
- Notifies the provider when the information obtained through the primary source verification process varies substantially from what the provider provided;
- Ensures credentialing/recredentialing information is kept confidential; and
- States that practitioners have a right to be informed of the status of their application upon request, and must describe the process for responding to such request, including information that the organization may share with practitioners with the exception that this does not require the organization to allow a practitioner to review references, recommendations or other peer-review protected information.

Provider File. NARBHA must maintain an individual credentialing/recredentialing file for each credentialed provider. Each file must include:

- The initial credentialing and all subsequent recredentialing applications, including attestation by the applicant of the correctness and completeness of the application as demonstrated by signature on the application;
- Information gained through credentialing and recredentialing queries;
- Utilization data, quality of care concerns, performance measure rates, and level of member satisfaction; and
- Any other pertinent information used in determining whether or not the provider meets the NARBHA's credentialing and recredentialing standards.



Notification Requirement. NARBHA must have procedures for reporting to appropriate authorities, including the Arizona Health Care Cost Containment System (AHCCCS), the provider's regulatory board or agency, Adult Protective Services (APS), Child Protective Services (CPS), Office of the Attorney General (OAG), any serious quality deficiencies that could result in a provider's suspension or termination from the T/RBHA's network. If the issue is determined to have criminal implications, a law enforcement agency must also be notified. The T/RBHA must:

- Maintain documentation of implementation of the procedure, as appropriate;
- Have an appeal process for instances in which the T/RBHA chooses to alter the provider's contract based on issues of quality of care and/or service; and
- Inform the provider of the appeal process.

Additional Standards. Other standards related to the credentialing process include the following:

- The credentialing process must be in compliance with federal requirements that prohibit employment or contracts with providers excluded from participation under either Medicare or Medicaid:
 - Documentation must show that the following sites have been queried. Any provider that is found to be on any of the lists below may be terminated without the right to appeal:
 - [Health and Human Services-Office of Inspector General \(HHS-OIG\) List of Excluded Individuals/Entities \(LEIE\)](#); and
 - [General Services Administration \(GSA\) Excluded Parties List System \(EPLS\)](#);
- Mechanisms must be put in place to ensure that licensed providers renew licenses or certifications required by the appropriate licensing/certifying entity and continuously practice under a current and valid license/certification; and
- Behavioral health care providers who are part of the T/RBHA network are subject to an initial site visit as part of the initial credentialing process.

Temporary/Provisional Credentialing Process

NARBHA shall have 14 calendar days from receipt of a complete application to render a decision regarding temporary or provisional credentialing. Once provisional/temporary credentialing is approved, provider information must be entered into NARBHA's information system to allow payment to the provider effective the date the provisional credentialing is approved.

Providers working in a Federally Qualified Health Center (FQHC) and FQHC Look-alike Center, as well as hospital employed physicians (when appropriate), must be credentialed using the temporary or provisional credentialing process even if the provider does not specifically request their application be processed as temporary or provisional.

- If an expedited or temporary credentialing process is utilized, the following minimum requirements must be met:

A provider must complete a signed application that must include the following items:



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- Reasons for any inability to perform essential functions of the position, with or without accommodation;
- Lack of present illegal drug use;
- History of loss of license and/or felony convictions;
- History of loss or limitation of privileges or disciplinary action;
- Current malpractice insurance coverage; and
- Attestation by the applicant of the correctness and completeness of the application.

In addition, the applicant must furnish the following information:

- Minimum five-year work history or total work history if less than five years; and
- Current Drug Enforcement Agency (DEA) or Controlled Dangerous Substances (CDS) certificate, as applicable.

The T/RBHA must conduct primary source verification of the following:

- Licensure or certification (A signed statement from the medical or nursing board of examiners stating they do primary verification of education and internship/residency as part of the licensing process is acceptable);
- Board certification, if applicable, or the highest level of credential attained; and
- National Practitioner Data Bank (NPDB) query; or
 - In lieu of NPDB query, all of the following:
 - Minimum five-year history of professional liability claims resulting in a judgment or settlement;
 - Disciplinary status with regulatory board or agency; and
 - Medicare/Medicaid sanctions.

NARBHA's Medical Director must review the information obtained and determine whether to grant provisional credentials. Following approval of provisional credentials, the process of verification and committee review, as outlined in this Section, should be completed.

NARBHA must ensure compliance with all applicable credentialing requirements within six months following the granting of temporary credentials. If the provider has not been credentialed during this six month time period, then NARBHA may issue a second temporary credential. All credentialing must be completed by the end of the second six-month period.

An applicant for temporary credentialing shall complete the NARBHA application for Temporary Credentialing [NARBHA PM Form 3.20.1 Credentialing Application – Practitioners](#) and forward the application to the NARBHA Credentialing Unit.

NARBHA shall ensure that primary source verification is conducted on the applicant's license, the applicant's AHCCCS ID, and NPDB, EPLS, and LEIE queries.



Credentialing requirements

The following behavioral health professionals are subject to credentialing and recredentialing requirements outlined below:

- Physicians (MD and DO)
- Licensed Psychologists
- Nurse Practitioners
- Physician Assistants
- Licensed Clinical Social Workers (only required if they will be billing independently)
- Licensed Professional Counselors (only required if they will be billing independently)
- Licensed Marriage and Family Therapists (only required if they will be billing independently)
- Licensed Independent Substance Abuse Counselors (only required if they will be billing independently)

The initial credentialing process for these providers must include the following components:

A written application to be completed signed and dated by the potential provider that attests to the following elements:

- Reasons for any inability to perform essential functions of the position, with or without accommodation;
- Lack of present illegal drug use;
- If applicable, history of loss of license and/or felony convictions;
- If applicable, history of loss or limitation of privileges or disciplinary action;
- Current malpractice insurance coverage; and
- Attestation by the applicant of the correctness and completeness of the application.

In addition, the applicant must furnish the following:

- Minimum five-year work history or total work history if less than five years; and
- DEA or CDS certification as applicable.

Primary source verification of:

- Licensure by the appropriate state licensing board;
- Board certification, if applicable, or highest level of credentials attained;



- Documentation of graduation from an accredited school and completion of any required internships/residency programs, or other postgraduate training (a signed statement from the medical or nursing board of examiners stating they do primary verification of education and internship/residency as part of the licensing process is acceptable);
- NPDB query; or

In lieu of NPDB query, all of the following must be verified:

Minimum five-year history (or total history if less than five years) of professional liability claims resulting in judgment or settlement;

Disciplinary actions and licensure status with regulatory board or agency if applicable;

Medicare/Medicaid sanctions if applicable; and

State sanctions or limitations of licensure.

For credentialing of independent masters level behavioral health therapists who are registered by AHCCCS to bill independently, primary source verification of:

- Licensure by the Arizona Board of Behavioral Health Examiners (AzBBHE);
- A review of complaints received and disciplinary status through the AzBBHE;
- Minimum five-year history, or total history if less than five years, of professional liability claims resulting in a judgment or settlement; and
- Medicare/Medicaid sanctions, if applicable.

Credentialing requirements for individuals who are not licensed or certified

Individuals who are not licensed or certified are included in the credentialing process. NARBHA delegates this process to our provider agencies. NARBHA reserves the right to approve, suspend or terminate any provider credentialed at this level as required by AHCCCS AM PM Manual Policy 910. This would occur during a Credentialing Committee meeting as needed if NARBHA deems this necessary.

Additionally, NARBHA shall review BHT and BHPP staff according to AHCCCS AM PM Policy 950 for residential placement settings for initially credentialed network residential facilities.

Recredentialing

NARBHA or its designee must ensure that all credentialed providers are recredentialled. The recredentialing process must:

- Occur at least every three years. NARBHA recredentialled providers every two years; and
- Update information obtained during the initial credentialing process with the exception of:
 - History of loss of license and/or felony convictions;



- Minimum five-year work history; and
- Board certification, if the provider is Board certified.

The recredentialing of individual providers must include a process for ongoing monitoring and intervention and if appropriate, provider sanctions, complaints and quality issues, which include, at a minimum, reviews of:

- Medicare/Medicaid sanctions;
- State sanctions or limitations on licensure;
- Member concerns including grievances (complaints) and appeals information;
- Utilization management information (such as: hospital length of stay, pharmacy utilization);
- Performance improvement and monitoring (such as performance measure rates);
- Results of any medical record review audits; and
- Quality of care issues (including trend data). If an adverse action is taken with a provider due to a quality of care concern, NARBHA must report the adverse action to the ADHS/DBHS Clinical Quality Management Unit.

Additional credentialing standards for hospitals and behavioral health facilities

Hospitals and behavioral health facilities (Office of Behavioral Health Licensure (OBHL) licensed Level I, II, III, outpatient clinics and ADHS/DBHS Title XIX certified Community Service Agencies) must ensure the following:

- The provider is licensed/certified to operate in Arizona as applicable and is in compliance with any other applicable state or federal requirements; and
- The provider is reviewed and approved by an appropriate accrediting body, or if not accredited, Centers for Medicare and Medicaid Services (CMS) certification, ADHS/DBHS Title XIX certification or state licensure review may substitute for accreditation. In this case, the provider must provide a copy of the report to the contracted T/RBHA that verifies that a review was conducted and compliance was achieved.

Organizational providers can complete initially and every two years a facility credentialing application, [NARBHA PM Form 3.20.2 Credentialing Application – Agencies - for agencies](#). NARBHA shall ensure that primary source verification is conducted on each facility license contained in the application. On an annual basis, and if a change occurs, the provider agency shall forward to the NARBHA Credentialing Unit a current license or certification for each licensed or certified facility, a certificate of insurance as required in the contract between NARBHA and the provider, and if applicable, other documentation contained in this Section.

All subcontracted provider agencies in the NARBHA provider network shall provide documentation of meeting the minimum credentialing and insurance requirements as a condition of participating in NARBHA's provider network. Prior to issuing an initial provider



contract, and on an annual basis for existing subcontracted providers, the following documentation shall be submitted to NARBHA:

For each facility that is licensed by the ADHS Office of Behavioral Health Licensure (OBHL) and under subcontract with NARBHA, all of the following:

- A copy of the current license;
- A copy of the most recent Program Description that corresponds to the licensed facility and that is filed with OBHL.
 - If the provider is a Community Service Agency, a current copy of the certificate issued by ADHS/DBHS.
 - If the provider is an HCTC home, a current copy of the license issued by the DES Office of Licensing, Certification and Regulation or their designee.
 - If the provider is a habilitation agency, a current copy of the license issued by the DES Office of Licensing, Certification and Regulation.
- The provider's current and appropriate AHCCCS ID and National Provider Identification (NPI) number for each provider type under subcontract.
- Accreditation or Medicare certification if required by the ADHS/DBHS Covered Behavioral Services Guide.
- Evidence of full compliance with insurance requirements contained in the provider subcontract.

Initial Assessment of Organizational Providers

As a prerequisite to contracting with the provider, NARBHA must ensure that the organizational provider has established policies and procedures that meet AHCCCS requirements. The requirements described in this section must be met for all providers included in the NARBHA network (including, but not limited to, hospitals, home health agencies, attendant care agencies, group homes, nursing facilities, behavioral health facilities, dialysis center, transportation companies, dental and medical schools, and free standing surgi-centers; see [AHCCCS Medical Policy Manual, Chapter 950](#)). New Organizational Providers' policies will need to meet certain requirements. Please see [PM Form 3.20.3 – Policy Checklist](#).

Prior to contracting with the provider, NARBHA must:

- Confirm that the provider has met all the state and federal licensing and regulatory requirements (a copy of the license or letter from the regulatory agency will meet this requirement);
- Confirm that the provider is reviewed and approved by an appropriate accrediting body as specified by the Centers for Medicare and Medicaid Services (CMS) (a copy of the accreditation report or letter from the accrediting body will meet this requirement). The T/RBHA must state in policy which accrediting bodies it accepts;
- Conduct an onsite quality assessment if the provider is not accredited. NARBHA must develop a process and utilize assessment criteria for each type of unaccredited organizational provider for which it contracts which must include, but is not limited to, confirmation that the organizational provider has the following:



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- A process for ensuring that they credential their practitioners;
- Liability insurance;
- Business license; or
- CMS certification or state licensure review/audit may be substituted for the required site visit. In this circumstance, NARBHA must obtain the review/audit documentation from CMS or the state licensing agency and verify that the review/audit was conducted and that the provider meets the NARBHA's standards. A letter from CMS that states the organizational provider was reviewed/audited and passed inspection is sufficient documentation when NARBHA has documented that they have reviewed and approved the CMS criteria and they meet the T/RBHA's standards.
- Review and approve the provider through NARBHA's credentialing committee.

Reassessment of Organizational Providers

NARBHA must reassess organizational providers at least every three years. The reassessment must include the following components and all information utilized by NARBHA must be current:

- Confirmation that the organizational providers remain in good standing with State and Federal bodies, and, if applicable, are reviewed and approved by an accrediting body. To meet this component, NARBHA must validate that the organizational provider meets the conditions listed below:
 - Federal requirements as applicable; and
 - Is licensed to operate in the State, and is in compliance with any other State requirements. If an organization provider is not accredited or surveyed or licensed by the State, an on-site review must be conducted, including minimally the components described above in subsection 3.20.7-F, second bullet;
- Assess data available to NARBHA including:
 - The most current review conducted by the ADHS Division of Licensing and/or summary of findings (please include date of review);
 - Record of on-site inspection of non-licensed organizational providers to ensure compliance with service specifications.
- Evaluate organizational provider specific information including, but not limited to, the following:
 - Member concerns which include grievances (complaints);
 - Utilization management information (if applicable);
 - Performance improvement and monitoring (if applicable);
 - Results of medical records review audits (if applicable);



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- Quality of care issues and, if an adverse action is taken with a provider due to a quality of care concern, NARBHA must report the adverse action to the ADHS/DBHS Clinical Quality Management Unit; and
- Onsite assessment.
- Review and approval by NARBHA's credentialing committee with formal documentation that includes any discussion, review of thresholds, and complaints or grievances.

Community Service Application Process

Community Service Agencies will apply for certification utilizing DBHS required forms as outlined on the DBHS website. These agencies will submit these applications no later than 60 days prior to the expiration date of the current CSA certification or as soon as possible for new Community Service Agencies. An amendment application must be submit prior to a site move.

CSA applications will be reviewed by NARBHA credentialing staff for completeness and accuracy and submitted to DBHS for approval.

Notice of Requirements (Limited to Providers)

NARBHA must have procedures for reporting (in writing) to appropriate authorities (ADHS/DBHS, AHCCCS, the provider's regulatory board or agency, OAG, etc.) any known serious issues and/or quality deficiencies. If the issue/quality deficiency results in a provider's suspension or termination from NARBHA's network, it must be reported. If the issue is determined to have criminal implications, a law enforcement agency must also be notified.

- NARBHA must maintain documentation of implementation of the procedure, as appropriate;
- NARBHA must have an appeal process for instances in which NARBHA chooses to alter the provider's contract based on issues of quality of care and/or service; and
- NARBHA must inform the provider of the appeal process.

Corporate Compliance Requirements for All Staff at All NARBHA Contracted Providers

The Subcontracted Provider shall not employ or subcontract with individuals or entities excluded from participation in a Federal health care program.

Each NARBHA Subcontracted Provider shall comply with 42 CFR 438.610 and 42 CFR 1001.1901 which prohibits the provider from knowingly having a relationship with any person or entity that is debarred, suspended or otherwise excluded from participating in procurement or non-procurement activities in accordance with the regulations and guidelines of Executive Order No, 12549.

Each NARBHA Subcontracted Provider shall check potential and existing employees and subcontracts against the Excluded Provider List System (EPLS) and the Health and Human Services (HHS) List of Excluded Individuals/Entities (LEIE) databases as required per contract.

The Subcontracted Provider shall notify NARBHA, AHCCCS-OPI and DBHS-OPI immediately of any confirmed instances of an excluded provider that is or appears to be in a prohibited relationship with NARBHA or the Subcontracted Provider.



Each NARBHA Subcontracted Provider shall comply with NARBHA monitoring of the requirements contained in this Section.

3.20.4 References

The following citations can serve as additional resources for this content area:

- [42 CFR 438.214](#)
- [A.R.S. Title 32, Chapter 33](#)
- [A.R.S. § 36-551](#)
- [4 A.A.C. 6](#)
- [A.A.C. R9-20-101](#)
- [A.A.C. R9-20-204](#)
- [AHCCCS/ADHS Contract](#)
- [ADHS/RBHA Contract](#)
- [ADHS/TRBHA IGAs](#)
- [AHCCCS Medical Policy Manual, Chapter 950](#)
- [Section 3.9, Assessment and Service Planning](#)
- [Section 3.10, SMI Eligibility Determination](#)
- [ADHS/DBHS Covered Behavioral Health Services Guide](#)

3.20.5 PM Forms

- [NARBHA PM Form 3.20.1 – Credentialing Application – Practitioners](#)
- [NARBHA PM Form 3.20.2 Credentialing Application – Agencies](#)
- [PM Form 3.20.3 – Policy Checklist](#)

3.20.6 PM Attachments

- [PM Attachment 3.20.1 NARBHA Desktop Protocol for Credentialing Appeals](#)

Signature on file

09/25/14

Mary Jo Gregory
President and Chief Executive Officer

Date

[Reference ADHS/DBHS Policy 405](#)