

SAN MATEO COUNTY HEALTH SYSTEM
BEHAVIORAL HEALTH & RECOVERY SERVICES

DATE: January 22, 2004

BHRS POLICY: 04-01

SUBJECT: Compliance Policy for Funded Services Provided by Contracted Organizational Providers

AUTHORITY: 42 CFR (438.608) Managed Care Regulations, Program Integrity. Contracts with Department of Health Care Services for: Behavioral Health, Substance Use Disorders Services (SUDS) and Drug Medi-Cal (DMC). Center for Medicaid & Medicare (Chapter 21 - Compliance Program Guidelines and Prescription Drug Benefit Manual Chapter 9 - Compliance Program Guidelines). Behavioral Health & Recovery Services (BHRS) Compliance Program.

ATTACHMENT: A: Contractor Monthly Credentialing Verification Spreadsheet

AMENDED: February 14, 2017

PURPOSE:

To ensure that all Behavioral Health and Recovery Services (BHRS) Contracted Organizational Providers employ staff members eligible to provide services charged to or associated with a federal health care program.

To ensure that all required on-going credential checks are conducted.

DEFINITIONS:

For the purpose of this policy, Contracted Organizational Providers are those agencies that provide a State or Federal reimbursable service to a client referred, authorized or managed under the terms of a contract with San Mateo County.

POLICY:

Employees of BHRS and of County Contracted services must be screened for any federal or state exclusion, debarment, licensure or section registry that renders them ineligible to perform work related directly or indirectly to Federal or State health care programs. Claims for services that are submitted for reimbursement to any Federal, State or private source shall be based on complete and timely credentialing in accordance with applicable Federal and State regulations and with applicable BHRS policy.

San Mateo County BHRS will not contract with an individual or entity whose name appears on any federal or state exclusion, debarment, licensure or section registry that makes them ineligible to perform work related directly or indirectly to Federal or State health care programs. If the individual or entity with which San Mateo County has a relationship falls into any of the debarred categories, San Mateo BHRS will cease contracting with the entity or individual. Contractors will provide information using Attachment A for all new employees.

Certification and Credentials

To ensure that all services were provided by eligible staff, contractors will perform the following certification checks in addition to other credentialing activities performed by the contractor and in compliance with any scope of practice limitations:

Contract Agency Responsibilities Include:

1. Screening for new Contractor employees:

Pre-hire: Prior to hiring, the contractor/organization must ensure that the individual being considered for employment or contracting meets the following criteria: holds valid, current license(s), is in good standing with the appropriate board(s), and has a current NPI on the NPPES website, as needed. Whenever possible, pre-hire candidates are entered on the Attachment A spreadsheet for monthly submission.

Contractors are required to conduct the following checks prior to hiring:

- A. For clinical and medical staff credentials are verified:
 - a. National Plan and Provider Enumeration System (NPPES) is verified at <https://npiregistry.cms.hhs.gov/>
 - b. Licenses are verified at www.breeze.ca.gov
 - c. Drug Enforcement Administration (DEA) <https://www.dea.gov/>

- B. For all staff - an exclusion review is conducted using:
 - a. Office of Inspector General (OIG/LEIE)
<https://exclusionsoig.hhs.gov/Default.aspx>
https://oig.hhs.gov/exclusions/exclusions_list.asp
 - b. Medi-Cal Suspended and Ineligible list
<http://files.medi-cal.ca.gov/pubsdoco/SandILanding.asp>
 - c. Social Security Administration's Death Master File (**SM County will ensure this is checked within the month of hire)
 - d. System Award Management (SAM) Database
<https://www.sam.gov/portal/SAM/##11>

- C. MDs/DOs/NPs/Psychologists/MFTs/LCSW/LPCCs are checked for Medicare exclusions at: <https://med.noridianmedicare.com/web/jeb/enrollment/opt-out/opt-out-listing>

- D. MDs/DOs/NPs will provide evidence that they have registered at the State of California Department of Justice Controlled substance Utilization Review and Evaluation System (CURES) located at <https://cures.doj.ca.gov>
- E. AOD/SUD (Alcohol and other Drug/Substance Use Disorder Providers)
Contracted providers of AOD/SUD services are required to check the following databases for all individuals under consideration for hire and ongoing to ensure that AOD credentials are current and that staff are in good standing.
- a. DHCS posts the revoked and suspended counselor list here:
<http://www.dhcs.ca.gov/provgovpart/Pages/CounselorCertificationOrganizations.aspx>
 - b. Addiction Counselor Certification Board of California (CAADE)
www.caade.org
 - c. California Association of DUI Treatment Programs (CADTP)
www.cadtp.org
 - d. California Consortium of Addiction Programs and Professionals (CCAPP)
www.ccapp.us
- F. For all contract/organizational providers – must comply with fingerprinting and background checks per your contract with SM County.

2. Contractor Employee Ongoing Monthly checks:

- Contract agencies (Mental Health & AOD/SUD) are required to fully complete Attachment A and submit it to BHRS by the first of the month, every month. The following data elements must be entered into Attachment A by the contractor, encrypted and emailed to Quality Management at HS_BHRS_QM@smcgov.org
- It may also be delivered to Quality Management in a secure electronic format.
 - a. First name
 - b. Middle name
 - c. Last name
 - d. Date of birth
 - e. Social Security number
 - f. License number (if applicable)

Upon Submission of Attachment ‘A’ BHRS will conduct the following monthly checks:

1. All the exclusion databases below will be checked by BHRS monthly utilizing the Attachment A: Contractor Monthly Credentialing Verification. This attachment must be submitted monthly, no later than first day of every month. Below are the exclusion lists included in the monthly Streamline Verify review used by BHRS:
 - a. Office of Inspector General (OIG/LEIE)
 - b. Medi-Cal Suspended and Ineligible list
 - c. Social Security Administration’s Death Master File
 - d. System Award Management (SAM) Database

- e. BReEZe (online licensing and enforcement system)
- 2. The BHRS Quality Management staff will notify a Contractor of any excluded or debarred staff. Immediate action will be taken by the contractor to terminate the excluded or debarred staff or remove the individual from providing services and claiming Federal and State funds.
- 3. The information may be sent to BHRS Quality Management using the secure email at HS_BHRS_QM@smcgov.org The information is stored in a secure drive.

If there are findings from a Screening:

- The contractor will not submit for reimbursement any service performed by the excluded individual, and may not submit billing for an excluded individual until any discrepancies are resolved and it is clear that the individual is not and will not be excluded or debarred. If an individual provides satisfactory evidence that they are not on the Office of Inspector General (OIG) and the Medi-Cal Suspended and Ineligible and Medicare Exclusion lists, that individual may be considered eligible for employment or contract.
- If an individual is found to be excluded on a monthly review they will immediately be stopped from providing services, and billing will not be submitted to BHRS for reimbursement. Any claims to Federal and State funds will be blocked by BHRS program administration.
- If credentials are not able to be verified, the individual should not be hired or contracted for clinical, medical or any position requiring credentials. If the individual's National Provider Identifier (NPI) is not up-to-date or the individual does not have an NPI, the individual must update or obtain an NPI before the contractor will allow them to provide services.
- Quality Management will immediately notify MIS to block the individual(s) from billing to any payer. Any submitted billing submitted after the date of exclusion will be voided.

Approved: _____ *(Signature on file)*
 Scott Gruendl, MPA
 BHRS Assistant Director & Compliance Officer

Approved: _____
 Stephen Kaplan, LCSW
 BHRS Director

Next Review Due: August 2017

Reviewed by: _____

Scott Gruendl, MPA Compliance Officer (Date)