



MENDOCINO COUNTY BEHAVIORAL HEALTH & RECOVERY SERVICES



POLICY AND PROCEDURE

Service Area: Behavioral Health and Recovery Services

Subject: Staff and Provider Screening, Verification, and Credentialing

Subject Matter

Expert:

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Previous or Referenced

Policy No.: II.B-3S, II.B-11M, III.A-9, III.A-10

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PURPOSE:

To document requirements and procedures for obtaining and evaluating background information prior to and during employment at Mendocino County Behavioral Health and Recovery Services (BHRS).

To ensure that every new BHRS employee and independent contractor receives appropriate training and orientation to carry out his/her duties, in compliance with applicable federal, state, and county rules and regulations.

To ensure that every new BHRS employee and independent contractor that provide behavioral health care services is eligible to provide services claimed for reimbursement.

To ensure that Contracted Providers and Subcontractors are eligible to provide services that are claimed for reimbursement.

To ensure that all required monthly checks of exclusion databases are conducted.

Definitions:

- Federal Health Care Program means Medicare, Medicaid (Medi-Cal in CA), and all other federal health care programs defined in Federal law (See citations below).
- Ineligible Person is an individual or entity who (1) is currently excluded, suspended, debarred or otherwise ineligible to participate in federal health care

programs or (2) has been convicted of a criminal offense related to the provision of health care services and has not been reinstated by the federal health care program to provide services after a period of exclusion, suspension, debarment or ineligibility. No manager/supervisor will make an offer of employment to an applicant listed as an ineligible person. Managers/supervisors must immediately advise the Compliance Officer and Quality Assurance Performance Improvement Manager of any current employee who is listed as an ineligible person.

- New Employees includes staff transferring into BHRS from other Mendocino County jobs.
- OIG is the Office of the Inspector General
- Conditional Job Offer is one that is extended to a potential employee with the understanding that it is contingent upon the successful completion of all county screening requirements.
- CURES is the Controlled Substance Utilization Review and Evaluation System (CURES) stores Schedule II, III, and IV controlled substance prescription information reported as dispensed in California.
- Contracted Providers also includes all subcontractors.
- Administrative Service Organization (ASO) is an organization the BHRS contracts with to administer behavioral health services through contracting with providers for services.

POLICY:

In addition to the criteria of Mendocino County Policy No. 45 Pre-Employment Policy, offers of employment for personnel within Mendocino County BHRS are contingent upon completing an application and a background investigation through Mendocino County's Human Resources Department. Conditional job offers may be made but are not finalized until screening and background checks are successfully completed.

Mendocino County BHRS will not employ or contract with any individual, entity or independent contractor that is deemed an Ineligible Person.

All new employees and independent contractors receive written materials and are trained in policies related to compliance during their initial orientation to BHRS. All staff shall acknowledge in writing that they have received and read the policies contained within the BHRS Policy Manual and any others deemed necessary. Evidence of compliance training will be maintained by BHRS Quality Assurance Performance Improvement (QAPI). Additional training, appropriate to the individual's work assignment, will be completed in a timely manner.

Staff who fail to attend or complete mandatory training are required to work with their supervisor and Compliance Manager to ensure training is completed. All staff and independent contractors will complete the online BHRS compliance and confidentiality trainings at hire and attend mandatory trainings yearly.

Nothing in this policy is intended to supersede or amend existing related policies including, but not limited to: 92-03 (Affirmative Action), 98-15 (Fingerprinting), 98-16 (Credentialing for County Licensed Staff), and 96-01 (Volunteers).

The Administrative Service Organization (ASO) within their staff hiring, conducts background checks, verifies and credentials candidates and not employ or contract with

any individual, entity or independent contractor that is deemed an Ineligible Person. The ASO provides compliance training and ensures ASO staff and contractors attend annual mandatory trainings provided by BHRS.

PROCEDURE:

A. Screening New Staff/New Independent Contractors:

Prior to hiring an employee or contracting with an independent contractor, BHRS QAPI ensures that the individual being considered for employment or contracting has been screened and ensures prospective employee/contractor:

- Has valid, current license(s) and is in good standing with the appropriate board(s)
- Has evidence of graduation or completion of any required education, as required for the particular provider type
- Proof of completion of any relevant medical residency and/or specialty training, as required for the particular provider type
- Satisfaction of any applicable continuing education requirements, as required for the particular provider type
- Has a current NPI on the NPPES website.

Upon acceptance of the offer for employment/contract the individual is required to undergo fingerprinting, as needed, and provide his or her Social Security number to the BHRS Staff Support. On the same day, the BHRS Staff Support completes exclusion checks. Immediately after screening, BHRS Staff Support will destroy/shred all documentation of the Social Security number.

1. 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. For psychologists, social workers, marriage and family therapists and licensed professional counselors, licenses, interns and registrants are verified at www.breeze.ca.gov
 - c. Psychologist candidates must be waived or a waiver application will be submitted to the Department of Health Care Services (DHCS). A copy of the waiver will be obtained and tracked.
 - d. SUDT counselors are certified via one of the [DHCS recognized accredited organizations](#).
 - e. Drug Enforcement Administration (DEA) <https://www.dea.gov/>
2. For all staff - an exclusion review is conducted utilizing the following exclusion lists:
 - a. Office of Inspector General (OIG) List of Excluded Individuals/Entities (LEIE)
 - b. DHCS Medi-Cal List of Suspended and Ineligible Providers
 - c. Social Security Administration's Death Master File (at hiring only)
 - d. System Award Management (SAM) Database
3. MDs/DOs/NPs/Psychologists/MFTs/LCSWs are checked for Medicare opt-out at: <https://med.noridianmedicare.com/web/jeb/enrollment/opt-out/opt-out-listing>
4. 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>

5. For all potential employees – a Live Scan fingerprinting criminal background check is conducted by Staff Resources to ensure that the individual is cleared for employment by U.S. Department of Justice (DOJ). Those results are then shredded as required by DOJ.
6. Record Retention: Records of the background screenings are retained in accordance with personnel record retention requirements.

B. Ongoing Monthly checks:

- All BHRS staff and independent contractors are screened monthly against the exclusion lists and verifications:
 - a. Office of Inspector General List of Excluded Individuals/Entities (OIG/LEIE)
 - b. Medi-Cal List of Suspended and Ineligible Providers
 - c. System Award Management (SAM) Database
 - d. Active License, Registration or Intern
 - e. National Plan and Provider Enumeration System (NPPES)
- Record Retention: Records of the monthly checks are kept ten (10) years before being destroyed.

C. Screening Findings:

- If an individual or entity is found to be excluded on the above named databases, Mendocino County shall not hire/contract with the individual.
- If an individual is found to be excluded on a monthly review they will immediately be stopped from providing services, and claiming to federal and state funds will be blocked by the Administrative Services Manager.
- Clinical/medical staff positions/contracts: If credentials are unable to be verified, the individual cannot be hired for clinical, medical, or independent contract positions 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 employment or contracting with BHRS. Providers' licenses according to their due dates will be verified to be current and that the individual is in good standing. If a required license expires or the individual is not in good standing with any board that individual's scope and duties will be modified as necessary.
- BHRS fiscal agents and managing employees (as defined by 42 CFR § 455.101) who appear on the exclusion lists (or have been convicted of a crime related to federal health care programs) shall be reported to DHCS.

D. The Administrative Service Organizations (ASO) must submit a completed Credentialing and Verification form on all staff billing Medi-Cal to BHRS QAPI Unit before billing will be allowed. The forms will provide information to be able to review the staff person against the Social Security Death Master File, the National Plan and Provider Enumeration System database, the System Award Management (SAM) database, the Office of Inspector General List of Excluded Individuals/Entities (LEIE), and the DHCS Medi-Cal List of Suspended or Ineligible Providers. Any problems should be immediately discussed with BHRS staff.

- a. ASOs shall monitor monthly the provider staff that they contract with in accordance with section B above.
- b. ASOs shall check the SAM, LEIE and the DHCS Medi-Cal List of Suspended or Ineligible Providers databases monthly and will initiate

- immediate action to remove any individual found on a one of the list from providing services and claiming federal and state funds.
- c. BHRS staff will notify the Administrative Services Manager to prevent or reimburse billing.
 - d. BHRS staff will issue a Plan of Correction to the provider.

ASOs are also required to track all licensed, waived, and registered staff renewal dates within their providers and subcontractors.

- E. All clinical and medical providers (or as required by 42 C.F.R. Part 455, Subparts B and E) must enroll in the Medi-Cal program through the Department of Health Care Services' (DHCS) Provider Enrollment Division (PED) by enrolling through DHCS' Provider Application and Validation for Enrollment (PAVE) portal. Types of providers included, but are not limited to:

- Licensed Counselor
- Licensed Clinical Social Worker
- Licensed Marriage and Family Therapist
- Licensed Professional Clinical Counselor
- Marriage & Family Counselor
- Nurse Practitioner
- Physician (MD)
- Osteopath (DO)
- Physician Assistant
- Psychologist

For contracted providers, the ASO shall track PAVE enrollments and provide to BHRS QAPI. For County staff, QAPI will verify and track PAVE Enrollments.

- F. A Credentialing and Verification form must be completed on all staff billing Medi-Cal and submitted to BHRS QAPI Unit before billing will be allowed.

Submit completed form to:
Mendocino County Mental Health QAPI Unit, Fax 707-463-6868.

REFERENCES:

45 CFR 164.530(c); 42 CFR 438.608
 42 CFR.1320a-7
 45 CFR § 164.306; 45 CFR § 164.308
 42 CFR § 455.410
 Mendocino County Policy No. 45 Pre-Employment Policy
 Exhibit A of MHP Contract
 Exhibit A, Attachment I of SUD Contract