Credentialing overview

Florida | Simply Healthcare Plans, Inc. (Simply) | Statewide Medicaid Managed Care (SMMC) • Florida Healthy Kids (FHK) • Medicare Advantage
Florida | Clear Health Alliance (CHA) | Statewide Medicaid Managed Care (SMMC)

The credentialing summary, criteria, standards, and requirements set forth herein are not intended to limit Simply and CHA's discretion in any way to amend, change or suspend any aspect of Simply and CHA's credentialing program nor is it intended to create rights on the part of practitioners or HDOs who seek to provide healthcare services to members. Simply and CHA further retains the right to approve, suspend, or terminate individual physicians and healthcare professionals, and sites in those instances where it has delegated credentialing decision-making.

Credentialing scope

Credentialing requirements apply to the following:

- Practitioners licensed, certified, or registered by the state to practice independently (without direction or supervision)
- Practitioners who have an independent relationship with Simply and CHA
  - An independent relationship exists when Simply and CHA directs its members to see a specific practitioner or group of practitioners, including all practitioners a member can select as primary care practitioners and practitioners who provide care to members under Simply and CHA's medical benefits.

The criteria listed above apply to practitioners in the following settings:

- Individual or group practices
- Locum tenens:
  - Provisional credentialing is required if these practitioners work fewer than 60 calendar days.
  - Full credentialing is required if these practitioners work 60 calendar days or more.
  - Covering practitioners (for example, locum tenens) who do not have an independent relationship with the company are not included in the credentialing scope.
- Facilities
- Rental networks:
  - Rental networks that are part of Simply and CHA's primary network and include Simply and CHA members who reside in the rental network area.
  - Specifically, for out-of-area care, and members may see only those practitioners or are given an incentive to see rental network practitioners.
- Virtual care
- PPO network:

Simply Healthcare Plans, Inc. is a Managed Care Plan with a Florida Medicaid contract and a Florida Healthy Kids contract.
Simply Healthcare Plans, Inc. dba Clear Health Alliance is a Managed Care Plan with a Florida Medicaid contract.
Simply Healthcare Plans, Inc. is a Medicare contracted coordinated care plan that has a Medicaid contract with the State of Florida Agency for Health Care Administration to provide benefits or arrange for benefits to be provided to enrollees. Enrollment in Simply Healthcare Plans, Inc. depends on contract renewal.
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- If an organization contracts with a PPO network to provide health services to members who need care outside its service area, and if it encourages members to obtain care from that network when they are outside the network, NCQA considers this to be an independent relationship if:
  - Information about the network is included in member materials or on an ID card that directs members to the network (for example, network name, phone number, logo), or
  - There are incentives for members to see the PPO's practitioners.
- In this type of contractual arrangement, the organization must credential the practitioners or delegate credentialing to the PPO network.

Simply and CHA credentials the following licensed/state-certified independent healthcare practitioners:

- Medical Doctors (MD)
- Doctors of Osteopathic Medicine (DO)
- Doctors of Podiatry
- Chiropractors
- Optometrists providing health services covered under the health benefit plan
- Doctors of dentistry providing Health Services covered under the health benefit plan including oral and maxillofacial surgeons
- Psychologists who have doctoral or master's level training
- Clinical social workers who have master's level training
- Psychiatric or behavioral health nurse practitioners who have master's level training
- Other behavioral health care specialists who provide treatment services under the health benefit plan
- Virtual care practitioners who provide treatment services under the health benefit plan
- Medical therapists (for example, physical therapists, speech therapists, and occupational therapists)
- Genetic counselors
- Audiologists
- Acupuncturists (non-MD/DO)
- Nurse practitioners
- Certified nurse midwives
- Physician assistants (as required locally)
- Registered dietitians

The following behavioral health practitioners are not subject to professional conduct and competence review under the credentialing program, but are subject to a certification requirement process, including verification of licensure by the applicable state licensing board, to independently provide behavioral health services and/or compliance with regulatory or state/federal contract requirements for the provision of services:

- Certified behavioral analysts
- Certified addiction counselors
- Substance use disorder practitioners

We credential the following health delivery organizations (HDOs):

- Hospitals
- Home health agencies
- Skilled nursing facilities (nursing homes)
- Ambulatory surgical centers
- Behavioral health facilities providing mental health and/or substance use disorder treatment in inpatient, residential, or ambulatory settings, including:
  - Adult family care/foster care homes
  - Ambulatory detox
  - Community mental health centers
  - Crisis stabilization units
  - Intensive family intervention services
  - Intensive outpatient – mental health and/or substance use disorder
  - Methadone maintenance clinics
  - Outpatient mental health clinics
  - Outpatient substance use disorder clinics
  - Partial hospitalization — mental health and/or substance use disorder
  - Residential treatment centers — psychiatric and/or substance use disorder
- Birthing centers
- Home infusion therapy when not associated with another currently credentialed HDO
- Durable medical equipment care providers

The following HDOs are not subject to professional conduct and competence review under the credentialing program, but are subject to a certification requirement process as directed by CMS, including verification of licensure by the applicable state licensing agency and/or compliance with regulatory or state/federal contract requirements for the provision of services:

- Clinical laboratories (CLIA Certification of Accreditation or CLIA Certificate of Compliance)
- End-stage renal disease (ESRD) service care providers (dialysis facilities) (CMS Certification or National Dialysis Accreditation Commission)
- Portable X-ray suppliers (CMS certification)
- Home infusion therapy when associated with another currently credentialed HDO (CMS Certification)
- Hospice (CMS certification)
- Federally qualified health centers (FQHC) (CMS certification)
- Rural health clinics (CMS certification)
- Orthotics and prosthetics suppliers (American Board for Certification in Orthotics and Prosthetics [ABCOP] or Board of Certification/Accreditation [BOC] or The National Examining Board of Ocularists [NEBO])

Credentials committee

The decision to accept, retain, deny, or terminate a practitioner's or HDO's participation in one or more of Simply and CHA's networks or plan programs is conducted by a peer review body, known as Simply and CHA's credentials committee (the CC).

The CC will meet at least once every 45 calendar days. The presence of a majority of voting CC members constitutes a quorum. The chief medical officer, or a designee appointed in consultation with the vice president of medical and credentialing policy, will designate a chair of the CC, as well as a vice-chair in states or regions where both Commercial and Medicaid contracts exist. In states or regions where Medicare Advantage is represented, a second vice-chair representing Medicare Advantage may be designated. In states or regions where a Simply and CHA affiliated care provider organization is represented, a second vice-chair representing that organization may be designated. The chair must be a state or regional lead medical director, or an Simply and CHA medical director designee, and the vice-chair must be a lead medical officer or an Simply and CHA] medical director designee, for that line of business not represented by the chair. In states or regions where only one line of business is represented, the chair of the CC will designate a vice-chair for that line of business also represented by the chair. The CC will include at least five, but no more than 10 external physicians representing multiple medical specialties (in general, the following specialties or practice-types should be represented: pediatrics, obstetrics/gynecology, adult medicine (family medicine or internal medicine), surgery, behavioral health, with the option of using other specialties when needed as determined by the chair/vice-chair). CC membership may also include one to two other types of credentialed healthcare providers (for example, nurse practitioner, chiropractor, social worker, podiatrist) to meet priorities of the geographic region as per chair/vice-chair's discretion. At least two of the physician committee members must be credentialed for each line of business (for example, Commercial, Medicare, and Medicaid) offered within the geographic purview of the CC. The chair/vice-chair will serve as a voting member(s) and provide support to the credentialing/re-credentialing process as needed.

The CC will access various specialists for consultation, as needed to complete the review of a practitioner's credentials. A committee member will disclose and abstain from voting on a practitioner if the committee member (i) believes there is a conflict of interest, such as direct economic competition with the practitioner; or (ii) feels their judgment might otherwise be compromised. A committee member will also disclose if they have been professionally involved with the practitioner.

Determinations to deny an applicant's participation or terminate a practitioner from participation in one or more networks or plan programs require a majority vote of the voting members of the CC in attendance, the majority of whom are network practitioners.

During the credentialing process, all information that is obtained is confidential and not subject to review by third parties except to the extent permitted by law. Access to information will be restricted to those individuals who are deemed necessary to attain the objectives of the credentialing program. Specifically, information supplied by the practitioner or HDO in the application, as well as other non-publicly available information will be treated as confidential. Confidential written records regarding deficiencies found, the actions taken, and the recommended follow-up will be kept secure. Security mechanisms include secured office facilities and locked filing cabinets, a protected computer infrastructure with password controls and systematic monitoring, and staff ethics and compliance training programs. The procedures and minutes of the CC will be open to review by state and federal regulatory agencies and accrediting bodies to the extent permitted by law.

Practitioners and HDOs are notified of their right to review information submitted to support their credentialing applications. In the event credentialing information cannot be verified, or

if there is a discrepancy in the credentialing information obtained, Simply and CHA's credentialing staff (credentialing department) will contact the practitioner or HDO within 30 calendar days of the identification of the issue. This communication will notify the practitioner or HDO of their right to correct erroneous information or provide additional details regarding the issue and will include the process for submission of this additional information. Depending on the nature of the issue, this communication may occur verbally or in writing. If the communication is verbal, written confirmation will be sent at a later date. All communication on the issue, including copies of the correspondence or a detailed record of phone calls, will be documented in the practitioner's or HDO's credentials file. The practitioner or HDO will be given no less than 14 calendar days in which to provide additional information. On request, the practitioner or HDO will be provided with the status of their credentialing or recredentialing application.

Simply and CHA may request and will accept additional information from the applicant to correct or explain incomplete, inaccurate, or conflicting credentialing information. The CC will review the information and rationale presented by the applicant to determine if a material omission has occurred or if other credentialing criteria are met.

Nondiscrimination policy

Simply and CHA will not discriminate against any applicant for participation in its programs or care provider network(s) on the basis of race, gender, color, creed, religion, national origin, ancestry, sexual orientation, age, veteran, or marital status or any unlawful basis not specifically mentioned herein. Simply and CHA is required to include fields for the collection of practitioner race, ethnicity, and language on the application. However, Simply and CHAdoes not use such reported data to discriminate against a practitioner, and the application includes a statement indicating the provision of such information is optional. Additionally, Simply and CHA will not discriminate against any applicant on the basis of the risk of population they serve or against those who specialize in the treatment of costly conditions. Determinations as to which practitioners and care providers require additional individual review by the CC are made according to predetermined criteria related to professional conduct and competence. CC decisions are based on issues of professional conduct and competence as reported and verified through the credentialing process.Simply and CHA will review denials and terms for consistency and lack of discrimination annually to identify discriminatory practices in the selection of practitioners. These reviews are documented in a report summary format by reason for the denial or term for initial denials, recredentialing, terminations, and off-cycle terminations. The reasons for denial or term include: not board certified, license/board action, malpractice, education/training, hospital privileges, criminal conviction, DEA, hospital action, insurance, work history gap, and federal sanctions. In addition, annual audits of practitioner complaints about credentialing shall be reviewed for evidence of alleged discrimination. Should discriminatory practices be identified through annual review or through other means, Simply and CHA will take appropriate action(s) to track and eliminate those practices.

Initial credentialing

Each practitioner or HDO must complete a standard application form deemed acceptable by Simply and CHA] when applying for initial participation in one or more of Simply and CHA's networks or plan programs. For practitioners, the Council for Affordable Quality Healthcare (CAQH) ProView system is used. To learn more about CAQH, visit their website at https://caqh.org.

Simply and CHA will verify those elements related to an applicants' legal authority to practice, relevant training, experience and competency from the primary source, where applicable, during the credentialing process. All verifications must be current and verified within the 120-calendar day period prior to the CC making its credentialing recommendation or as otherwise required by applicable accreditation standards. The application attestation, including work history verification must be dated and verified within 180 calendar days prior to the CC decision.

During the credentialing process, Simply and CHA will review, among other things, verification of the credentialing data as described in the following tables, unless otherwise required by regulatory or accrediting bodies. These tables represent minimum requirements.

A. Practitioners

Verification element
License to practice in the state(s) in which the practitioner will be treating members.
Hospital admitting privileges at a TJC, DNV NIAHO, CIHQ or ACHC accredited hospital, or a network hospital previously approved by the committee.
DEA/CDS and state-controlled substance registrations The DEA/CDS registration must be valid in the state(s) in which the practitioner will be treating members. Practitioners who see members in more than one state must have a DEA/CDS registration for each state.
Malpractice insurance
Malpractice claims history
Board certification or highest level of medical training or education
Work history
State or Federal license sanctions, exclusions or limitations
Medicare, Medicaid, or FEHBP sanctions and exclusions
National Practitioner Data Bank report
State Medicaid Exclusion Listing, if applicable

B. HDOs

Verification element
Accreditation, if applicable
License to practice, if applicable
Malpractice insurance
Medicare certification, if applicable
Department of Health Survey Results or recognized accrediting organization certification
License sanctions or limitations, if applicable
Medicare, Medicaid, or FEHBP sanctions and exclusions

Recredentialing

The recredentialing process incorporates reverification and the identification of changes in the practitioner's or HDO's licensure, sanctions and exclusions, certification, health status, and/or performance information (including, but not limited to, malpractice experience,

hospital privilege, or other actions) that may reflect on the practitioner's or HDO's professional conduct and competence. This information is reviewed in order to assess whether practitioners and HDOs continue to meetSimply and CHA credentialing standards.

All applicable practitioners and HDOs in the network within the scope of the credentialing program are required to be recredentialed every three years unless otherwise required by applicable state contract or state regulations.

HDOs

New HDO applicants will submit a standardized application to Simply and CHA for review. If the candidate meets Simply and CHA screening criteria, the credentialing process will commence. To assess whether network HDOs, within the scope of the credentialing program, meet appropriate standards of professional conduct and competence, they are subject to credentialing and recredentialing programs. In addition to the licensure and other eligibility criteria for HDOs, as described in detail below, in the Simply and CHA credentialing program standards section, all network HDOs are required to maintain accreditation by an appropriate, recognized accrediting body or, in the absence of such accreditation, Simply and CHA may evaluate the most recent site survey by Medicare, the appropriate state oversight agency, or a site survey performed by a designated independent external entity within the past 36 months for that HDO.

Ongoing sanction monitoring

To support certain credentialing standards between the recredentialing cycles, Simply and CHA has established an ongoing monitoring program. The credentialing department performs ongoing monitoring to help ensure continued compliance with credentialing standards and to assess for occurrences that may reflect issues of substandard professional conduct and competence. To achieve this, the credentialing department will review periodic listings/reports monthly or within 30 calendar days of the time they are made available from the various sources including, but not limited to, the following:

- Office of the Inspector General (OIG)
- Federal and State Medicare/Medicaid Reports
- Office of Personnel Management (OPM)
- State licensing Boards/Agencies
- Member/Customer services departments
- Clinical Quality Management Department (including data regarding complaints of both a clinical and non-clinical nature, reports of adverse clinical events and outcomes, and satisfaction data, as available)
- Other internalSimply and CHA departments
- Any other information received from sources deemed reliable by Simply and CHA.

When a practitioner or HDO within the scope of credentialing has been identified by these sources, criteria will be used to assess the appropriate response.

Appeals process

Simply and CHA has established policies for monitoring and recredentialing practitioners and HDOs who seek continued participation in one or more of Simply and CHA's networks or plan programs. Information reviewed during this activity may indicate that the professional conduct and competence standards are no longer being met, and Simply and CHA may wish

to terminate practitioners or HDOs. Simply and CHA also seeks to treat network practitioners and HDOs, as well as those applying for participation, fairly and thus provides practitioners and HDOs with a process to appeal determinations terminating/denying participation in Simply and CHA's networks for professional conduct and competence reasons, or which would otherwise result in a report to the National Practitioner Data Bank (NPDB).

Additionally, Simply and CHA will permit practitioners and HDOs who have been refused initial participation the opportunity to correct any errors or omissions that may have led to such denial (informal/reconsideration only). It is Simply and CHA's intent to give practitioners and HDOs the opportunity to contest a termination of the practitioner's or HDO's participation in one or more of Simply and CHA's networks or plan programs and those denials of request for initial participation which are reported to the NPDB that were based on professional conduct and competence considerations.

Immediate terminations may be imposed due to the practitioner's or HDO's license suspension, probation or revocation, if a practitioner or HDO has been sanctioned, debarred or excluded from the Medicare, Medicaid, or FEHB programs, has a criminal conviction, or Simply and CHA's determination that the practitioner's or HDO's continued participation poses an imminent risk of harm to members. Participating practitioners and HDOs whose network participation has been terminated due to the practitioner's suspension or loss of licensure or due to criminal conviction are not eligible for informal review/reconsideration or formal appeal. Participating practitioners and HDOs whose network participation has been terminated due to sanction, debarment, or exclusion from the Medicare, Medicaid, or FEHB are not eligible for informal review/reconsideration or formal appeal.

Reporting requirements

When Simply and CHA takes a professional review action with respect to a practitioner's or HDO's participation in one or more of its networks or plan programs, Simply and CHA may have an obligation to report such to the NPDB, state licensing board and legally designated agencies. In the event the procedures set forth for reporting reportable adverse actions conflict with the process set forth in the current NPDB Guidebook, the process set forth in the NPDB guidebook will govern.

Simply and CHA credentialing program standards

Eligibility criteria

Healthcare practitioners

Initial applicants must meet the following criteria in order to be considered for participation:

- Must not be currently federally sanctioned, debarred or excluded from participation in any of the following programs: Medicare, Medicaid or FEHBP
- Possess a current, valid, unencumbered, unrestricted, and non-probationary license in the state(s) where they provide services to members
- Possess a current, valid, and unrestricted Drug Enforcement Agency (DEA) and/or Controlled Dangerous Substances (CDS) registration for prescribing controlled substances, if applicable to their specialty in which they will treat members. The DEA/CDS registration must be valid in the state(s) in which the practitioner will be treating members. Practitioners who see members in more than one state must have a DEA/CDS registration for each state.
- Meet the education, training, and certification criteria as required by Simply and CHA

Initial applications should meet the following criteria in order to be considered for participation, with exceptions reviewed and approved by the CC:

- For MDs, DOs, DPMs, and DMDs/DDSs practicing oral and maxillofacial surgery, the applicant must have current, in force board certification (as defined by the American Board of Medical Specialties [ABMS], American Osteopathic Association [AOA], Royal College of Physicians and Surgeons of Canada [RCPSC], College of Family Physicians of Canada [CFPC], American Board of Foot and Ankle Surgery [ABFAS], American Board of Podiatric Medicine [ABPM], or American Board of Oral and Maxillofacial Surgery [ABOMS], in the clinical discipline for which they are applying.
- If not certified, MDs and DOs will be granted five years or a period of time consistent with ABMS or AOA board eligibility time limits, whatever is greater, after completion of their residency or fellowship training program to meet the board certification requirement.
- If not certified, DPMs will be granted five years after the completion of their residency to meet this requirement for the ABPM. Non-certified DPMs will be granted seven years after completion of their residency to meet this requirement for ABFAS.
- Individuals no longer eligible for board certification are not eligible for continued exception to this requirement.
  - As alternatives, MDs and DOs meeting any one of the following criteria will be viewed as meeting the education, training, and certification requirement:
    i. Previous board certification (as defined by one) of the following: ABMS, AOA, RCPSC, CFPC, ABFAS, ABPM, or ABOMS in the clinical specialty or subspecialty for which they are applying which has now expired and a minimum of 10 consecutive years of clinical practice;
    ii. Training which met the requirements in place at the time it was completed in a specialty field prior to the availability of board certifications in that clinical specialty or subspecialty; or
    iii. Specialized practice expertise as evidenced by publication in nationally accepted peer review literature and/or recognized as a leader in the science of their specialty and a faculty appointment of assistant professor or higher at an academic medical center and teaching facility in Simply and CHA]'s network and the applicant's professional activities are spent at that institution at least 50% of the time.
  - Practitioners meeting one of these three alternative criteria (i., ii., iii) will be viewed as meeting all Simply and CHA education, training and certification criteria and will not be required to undergo additional review or individual presentation to the CC. These alternatives are subject to Simply and CHA review and approval. Reports submitted by delegates to Simply and CHA must contain sufficient documentation to support the above alternatives, as determined by Simply and CHA.
  - For MDs and DOs, the applicant must have unrestricted hospital privileges at The Joint Commission (TJC), National Integrated Accreditation for Healthcare Organizations (DNV NIAHO), Center for Improvement in Healthcare Quality (CIHQ), an Accreditation Commission for Health Care (ACHC) accredited hospital, or a network hospital previously approved by the committee. Some clinical disciplines may function exclusively in the outpatient setting, and the CC may at its discretion deem

hospital privileges not relevant to these specialties. Also, the organization of an increasing number of physician practice settings in selected fields is such that individual physicians may practice solely in either an outpatient or an inpatient setting. The CC will evaluate applications from practitioners in such practices without regard to hospital privileges. The expectation of these physicians would be that there is an appropriate referral arrangement with a network practitioner to provide inpatient care.

- For genetic counselors, the applicant must be licensed by the state to practice independently. If the state where the applicant practices does not license genetic counselors, the applicant must be certified by the American Board of Genetic Counseling or the American Board of Genetics and Genomics.
- For registered dieticians (RD), the applicant must have completed a bachelor's degree at a U.S. regionally accredited university or college and coursework accredited or approved by the Accreditation Council for Education in Nutrition and Dietetics (ACEND) of the Academy of Nutrition and Dietetics. Completion of an ACEND accredited supervised practice program at a healthcare facility, community agency, or a food services corporation or combined with undergraduate or graduate studies. Typically, a practice program will run six to twelve months in length. Must have passed a national examination administered by the Commission on Dietetic Registration (CDR).

Criteria for selecting practitioners

New applicants (credentialing):

- Submission of a complete application and required attachments that must not contain intentional misrepresentations or omissions
- Application attestation signed date within 180 calendar days of the date of submission to the CC for a vote
- Primary source verifications within acceptable timeframes of the date of submission to the CC for a vote, as deemed by appropriate accrediting agencies
- No evidence of potential material omission(s) on application
- Current, valid, unrestricted license to practice in each state in which the practitioner would provide care to Members
- No current license action
- No history of licensing board action in any state
- * No current federal sanction or exclusion and no history of federal sanctions or exclusions (per System for Award Management [SAM], OIG, and OPM report nor on NPDB report)
- Possess a current, valid, and unrestricted DEA/CDS registration for prescribing controlled substances, if applicable to his/her specialty in which they will treat members. The DEA/CDS registration must be valid in the state(s) in which the practitioner will be treating members. Practitioners who treat members in more than one state must have a valid DEA/CDS registration for each applicable state.
- Initial applicants who voluntarily have no DEA/CDS registration, the exception listed below may apply or if the applicant can provide evidence that they have applied for a DEA/CDS registration, the credentialing process may proceed if all of the following are met:

  - It can be verified that this application is pending.
  - The applicant has made an arrangement for an alternative practitioner to prescribe controlled substances until the additional DEA/CDS registration is obtained. If the alternate care provider is a practice rather than an individual, the file may include the practice name. The company is not required to arrange an alternative prescriber;
  - The applicant agrees to notify Simply and CHA upon receipt of the required DEA/CDS registration.
  - Simply and CHA will verify the appropriate DEA/CDS registration via standard sources.
- The applicant agrees that failure to provide the appropriate DEA/CDS registration within a 90-calendar day timeframe will result in termination from the network.

Initial applicants who possess a DEA certificate in a state other than the state in which they will be seeing Simply and CHA's members will be notified of the need to obtain the additional DEA, unless the practitioner is delivering services in a telemedicine environment only and does not require a DEA or CDS registration in the additional location(s) where such telemedicine services may be rendered under federal or state law. If the applicant has applied for an additional DEA registration the credentialing process may proceed if all the following criteria are met:

- It can be verified that the applicant's application is pending
- The applicant has made an arrangement for an alternative care provider to prescribe controlled substances until the additional DEA registration is obtained
- The applicant agrees to notify Simply and CHA upon receipt of the required DEA registration
- Wewill verify the appropriate DEA/CDS registration via standard sources
- The applicant agrees that failure to provide the appropriate DEA registration within a 90-day time frame will result in termination from the network

Practitioners who voluntarily choose to not have a DEA/CDS registration if that practitioner certifies the following:

- Controlled substances are not prescribed within their scope of practice; or in their professional judgement, the patients receiving their care do not require controlled substances and
- They must provide documentation that an arrangement exists for an alternative care provider to prescribe controlled substances should it be clinically appropriate. If the alternate care provider is a practice rather than an individual, the file may include the practice name. The company is not required to arrange an alternative prescriber
- DEA/CDS registration is or was not suspended, revoked, surrendered, or encumbered for reasons other than those aforementioned.
  - No current hospital membership or privilege restrictions and no history of hospital membership or privileges restrictions; or for practitioners in specialties defined as requiring hospital privileges who practice solely in the outpatient setting, there exists a defined referral arrangement with a participating practitioner of similar specialty at a participating hospital who provides inpatient care to members requiring hospitalization.

- No history of or current use of illegal drugs or history of or current substance use disorder
- No impairment or other condition which would negatively impact the ability to perform the essential functions in their professional field
- No gap in work history greater than six months in the past five years; however, gaps up to 12 months related to parental leave or immigration will be acceptable and viewed as Level I. All gaps in work history exceeding six months will require additional information and review by the credentialing department. A verbal explanation will be accepted for gaps of six to 12 months. Gaps in excess of 12 months will require written explanations. All work history gaps exceeding six months may be presented to the geographic CC if the gap raises concerns of future substandard professional conduct and competence.
- No convictions, or pleadings of guilty or no contest to, or open indictments of, a felony or any offense involving moral turpitude or fraud. In addition, no other criminal or civil litigation history that together with any other relevant facts, raises a reasonable suspicion of future substandard professional conduct and/or competence.
- A minimum of the past 10 years of malpractice claims history is reviewed.
- Meets credentialing standards for education/training for the specialty(ies) in which practitioner wants to be listed inSimply and CHA's network directory as designated on the application. This includes board certification requirements or alternative criteria for MDs and DOs and board certification criteria for DPMs, and oral and maxillofacial surgeons;
- No involuntary terminations from an HMO or PPO.
- No *yes* answers to attestation/disclosure questions on the application form with the exception of the following:
  - Investment or business interest in ancillary services, equipment or supplies
  - Voluntary resignation from a hospital or organization related to practice relocation or facility utilization
  - Voluntary surrender of state license related to relocation or nonuse of said license
  - An NPDB report of a malpractice settlement or any report of a malpractice settlement that does not meet the threshold criteria
  - Non-renewal of malpractice coverage or change in malpractice carrier related to changes in the carrier's business practices (no longer offering coverage in a state or no longer in business)
  - Previous failure of a certification exam by a practitioner who is currently board certified or who remains in the five-year post residency training window
  - Actions taken by a hospital against a practitioner's privileges related solely to the failure to complete medical records in a timely fashion

- History of a licensing board, hospital or other professional entity investigation that was closed without any action or sanction

Note: the CC will individually review any practitioner that does not meet one or more of the criteria required for initial applicants.

Participation criteria and exceptions for non-physician credentialing

The following participation criteria and exceptions are for non-MD practitioners. It is not additional or more stringent requirements, but instead the criteria and exceptions that apply for these specific care provider types to permit a review of education and training.

- Licensed Clinical Social Workers (LCSW) or other master level social work license type based on state licensing regulations:
  - Master or doctoral degree in social work.
  - If master's level degree does not meet criteria and practitioner obtained PhD degree as a clinical psychologist, but is not licensed as such, the practitioner can be reviewed. In addition, a doctor of social work will be viewed as acceptable.
  - Licensure to practice independently.
- Licensed professional counselor (LPC), marriage and family therapist (MFT), licensed mental health counselor (LMHC) or other master level license type based on state licensing regulations:
  - Master's or doctoral degree in counseling, marital and family therapy, psychology, counseling psychology, counseling with an emphasis in marriage, family and child counseling or an allied mental field
  - Master or doctoral degrees in education are acceptable with one of the fields of study above
  - Master or doctoral degrees in divinity, masters in biblical counseling, or other primarily theological field of study do not meet criteria as a related field of study
  - Practitioners with PhD training as a clinical psychologist can be reviewed.
  - Practitioners with a doctoral degree in one of the fields of study will be viewed as acceptable.
  - Licensure to practice independently or in states without licensure or certification:
    - MFT with a master's degree or higher:
- Certified as a full clinical member of the American Association for Marriage and Family Therapy (AAMFT), or proof of eligibility for full clinical membership in AAMFT (documentation from AAMFT required)
    - Mental health counselors with a master's degree or higher:
- Care provider applicant must be a Certified Clinical Mental Health Counselor (CCMHC) as determined by the Clinical Academy of the National Board of Certified Counselors (NBCC) (proof of NBCC certification required) or meet all requirements to become a CCMHC (documentation of eligibility from NBCC required)
- Pastoral counselors:
  - Master's or doctoral degree in a mental health discipline
  - Licensed as another recognized behavioral health care provider type (for example, MD/DO, PsyD, SW, RNCS, ARNP, and MFT, OR LPC) at the highest level of independent practice in the state where the practice is to occur or must be licensed or certified as a pastoral counselor in the state where the practice is to occur
  - A fellow or diplomat member of the Association for Clinical Pastoral Education (ACPE) or meet all requirements to become a fellow or diplomat member of the ACPE (documentation of eligibility of ACPE required)
- Clinical nurse specialist/psychiatric and mental health nurse practitioner:
  - Master's degree in nursing with specialization in adult or child/adolescent psychiatric and mental health nursing

  - RN license and any additional licensure as an advanced practice nurse/certified nurse specialist/adult psychiatric nursing or other license or certification as dictated by the appropriate state(s) Board of registered nursing, if applicable
  - Certification by the American Nurses Credentialing Center (ANCC), a subsidiary of the American Nurses Association (ANA) in psychiatric nursing, or the Pediatric Nursing Certification Board.
    - This may be any of the following types: Clinical Nurse Specialist in Child or Adult Psychiatric Nursing, Psychiatric and Mental Health Nurse Practitioner, or Family Psychiatric and Mental Health Nurse Practitioner
  - Valid, current, unrestricted DEA/CDS registration, where applicable with appropriate supervision/consultation by a network practitioner as applicable by the state licensing board. For those who possess a DEA registration, the appropriate CDS registration is required. The DEA/CDS registration must be valid in the state(s) in which the practitioner will be treating members.
- Clinical psychologists:
  - Valid state clinical psychologist license
  - Doctoral degree in clinical or counseling, psychology or other applicable field of study
  - Master's level therapists in good standing in the network, who upgrade their license to clinical psychologist as a result of further training, will be allowed to continue in the network and will not be subject to the above education criteria
- Clinical neuropsychologist:
  - Must meet all the criteria for a clinical psychologist listed in Section 4 above and be Board certified by either the American Board of Professional Neuropsychology (ABPN) or American Board of Clinical Neuropsychology (ABCN)
  - A practitioner credentialed by the National Register of Health Service Providers (National Register) in psychology with an area of expertise in neuropsychology may be considered
  - Clinical neuropsychologists who are not board certified, nor listed in the National Register, will require CC review. These practitioners must have appropriate training and/or experience in neuropsychology as evidenced by one or more of the following:
    - Transcript of applicable pre-doctoral training
    - Documentation of applicable formal one-year post-doctoral training (participation in CEU training alone would not be considered adequate)
    - Letters from supervisors in clinical neuropsychology (including number of hours per week) or
    - Minimum of five years' experience practicing neuropsychology at least ten hours per week
- Licensed psychoanalysts:
  - Applies only to practitioners in states that license psychoanalysts.
  - Practitioners will be credentialed as a licensed psychoanalyst if they are not otherwise credentialed as a practitioner type detailed in Simply and CHA credentialing policy (for example, psychiatrist, clinical psychologist, licensed clinical social worker).
  - Practitioner must possess a valid psychoanalysis state license.

    - Meet minimum supervised experience requirement for licensure as a psychoanalyst as determined by the licensing state
    - Meet examination requirements for licensure as determined by the licensing state
- Process, requirements and verification — nurse practitioners:
  - The nurse practitioner (NP) applicant will submit the appropriate application and supporting documents as required of any other practitioners with the exception of differing information regarding education/training and board certification.
  - The required education/training will be, at a minimum, the completion of an education program leading to licensure as a registered nurse, and subsequent additional education leading to licensure as a NP. Verification of this will occur either via verification of the licensure status from the state licensing agency provided that that agency verifies the education. If the licensing agency does not verify highest level of education, the education will be primary source verified in accordance with policy.
  - The license status must be that of NP as verified via primary source from the appropriate state licensing agency. Additionally, this license must be active, unencumbered, unrestricted and not subject to probation, terms or conditions. Any applicants whose licensure status does not meet these criteria, or who have in force adverse actions regarding Medicare or Medicaid will be notified of this and the applicant will be administratively denied.
  - If the NP has prescriptive authority, which allows the prescription of scheduled drugs, their DEA and/or state certificate of prescriptive authority information will be requested and primary source verified via normal Simply and CHA procedures. If there are in force adverse actions against the DEA, the applicant will be notified of this and the applicant will be administratively denied.
  - All NP applicants will be certified in the area which reflects their scope of practice by any one of the following:
    - Certification program of the American Nurse Credentialing Center, a subsidiary of the American Nursing Association
    - American Academy of Nurse Practitioners – Certification Program
    - National Certification Corporation
    - Pediatric Nurse Certification Board (PNCB) Certified Pediatric Nurse Practitioner (note: CPN: certified pediatric nurse is not a nurse practitioner)
    - Oncology Nursing Certification Corporation (ONCC) – Advanced Oncology Certified Nurse Practitioner (AOCNP®) – only; or
    - American Association of Critical Care Nurses Acute Care Nurse Practitioner Certification (ACNPC); ACNPC-AG – Adult Gerontology Acute Care. If the applicant is not certified or if their certification has expired, the application will be submitted for individual review.
- If the NP has hospital privileges, they must have hospital privileges at a CIHQ, TJC, DNV NIAHO, or ACHC accredited hospital, or a network hospital previously approved by the committee. Information regarding history of any actions taken against any hospital privileges held by the nurse practitioner will be obtained. Any adverse action against any hospital privileges will trigger a Level II review.

- The NP applicant will undergo the standard credentialing processes outlined inSimply and CHA's credentialing policies. NPs are subject to all the requirements outlined in the credentialing policies including (but not limited to): the requirement for committee review of Level II files for failure to meet predetermined criteria, recredentialing every three years, and continuous sanction and performance monitoring on participation in the network.
- Process, requirements and verifications — certified nurse midwives:
  - The Certified Nurse Midwife (CNM) applicant will submit the appropriate application and supporting documents as required of any other practitioner with the exception of differing information regarding education, training and board certification.
  - The required educational/training will be at a minimum that required for licensure as a registered nurse with subsequent additional training for licensure as a CNM by the appropriate licensing body. Verification of this education and training will occur either via primary source verification of the license, provided that state licensing agency performs verification of the education. If the state licensing agency does not verify education, the education will be primary source verified in accordance with policy.
  - The license status must be that of CNM as verified via primary source from the appropriate state licensing agency. Additionally, this license must be active, unencumbered, unrestricted and not subject to probation, terms, or conditions. Any applicant whose licensure status does not meet these criteria, or who have in force adverse actions regarding Medicare or Medicaid will be notified of this and the applicant will be administratively denied.
  - If the CNM has prescriptive authority, which allows the prescription of scheduled drugs, their DEA and/or state certificate of prescriptive authority information will be requested and primary source verified via normal Simply and CHA procedures. If there are current adverse actions against the DEA, the applicant will be notified and the applicant will be administratively denied.
  - All CNM applicants will be certified by either:
    - The National Certification Corporation for OB/GYN and neonatal nursing; or
    - The American Midwifery Certification Board, previously known as the American College of Nurse Midwifes
- This certification must be active. If the applicant is not certified or if their certification has expired, the application will be submitted for individual review by the geographic CC.
- If the CNM has hospital privileges, they must have unrestricted hospital privileges at a CIHQ, TJC, DNV NIAHO, or ACHC accredited hospital, or a network hospital previously approved by the committee or in the absence of such privileges, must not raise a reasonable suspicion of future substandard professional conduct or competence. Information regarding history of any actions taken against any hospital privileges held by the CNM will be obtained. Any history of any adverse action taken by any hospital will trigger a Level II review. In the event the CNM provides only outpatient care, an acceptable admitting arrangement via the collaborative practice agreement must be in place with a participating OB/GYN.
- The CNM applicant will undergo the standard credentialing process outlined in Simply and CHA's credentialing policies. CNMs are subject to all the requirements of the

credentialing policies including (but not limited to): the requirement for CC review for Level II applicants, re-credentialing every three years, and continuous sanction and performance monitoring upon participation in the network.

- Process, requirements, and verifications — Physician's Assistants (PA):
  - The PA applicant will submit the appropriate application and supporting documents as required of any other practitioners with the exception of differing information regarding education/training and board certification.
  - The required education/training will be, at a minimum, the completion of an education program leading to licensure as a PA. Verification of this will occur via verification of the licensure status from the state licensing agency provided that that agency verifies the education. If the state licensing agency does not verify education, the education will be primary source verified in accordance with policy.
  - The license status must be that of PA as verified via primary source from the appropriate state licensing agency. Additionally, this license must be active, unencumbered, unrestricted and not subject to probation, terms, or conditions. Any applicants whose licensure status does not meet these criteria, or who have in force adverse actions regarding Medicare or Medicaid will be notified of this and the applicant will be administratively denied.
  - If the PA has prescriptive authority, which allows the prescription of scheduled drugs, their DEA and/or state certificate of prescriptive authority information will be requested and primary source verified via normal Simply and CHA procedures. If there are in force adverse actions against the DEA, the applicant will be notified and the applicant will be administratively denied.
  - All PA applicants will be certified by the National Commission on Certification of Physician's Assistants. This certification must be active. If the applicant is not certified or if their certification has expired, the application will be classified as a level II according to Credentialing Policy #8, as adopted or amended by each health plan and submitted for individual review by the CC.
  - If the PA has hospital privileges, they must have hospital privileges at a CIHQ, TJC, DNV NIAHO, or ACHC accredited hospital, or a network hospital previously approved by the committee. Information regarding history of any actions taken against any hospital privileges held by the PA will be obtained. Any adverse action against any hospital privileges will trigger a level II review.
  - The PA applicant will undergo the standard credentialing process outlined inSimply and CHA's credentialing policies. PAs are subject to all the requirements described in these credentialing policies including (but not limited to): committee review of level II files failing to meet predetermined criteria, recredentialing every three years, and continuous sanction and performance monitoring upon participation in the network
- Currently participating applicants (recredentialing)
  - Submission of complete recredentialing application and required attachments that must not contain intentional misrepresentations
  - Recredentialing application signed date 180 calendar days of the date of submission to the CC for a vote
  - Must not be currently federally sanctioned, debarred or excluded from participation in any of the following programs; Medicare, Medicaid, or FEHBP. If, once a practitioner

participates inSimply and CHA's plan programs or care provider networks, federal sanction, debarment or exclusion from the Medicare, Medicaid, or FEHBP programs occurs, at the time of identification, the practitioner will become immediately ineligible for participation in the applicable government programs or care provider networks as well as Simply and CHA's other credentialed care provider networks.

- Current, valid, unrestricted, unencumbered, un-probated license to practice in each state in which the practitioner provides care to members
- No new history of licensing board reprimand since prior credentialing review
- No current federal sanction or exclusion and no new (since prior credentialing review) history of federal sanctions or exclusions (per SAM, OIG, and OPM reports or on NPDB report)
- Current DEA/CDS registration and/or state-controlled substance certification without a new (since prior credentialing review) history of or current restrictions
- No current hospital membership or privilege restrictions and no new (since prior credentialing review) history of hospital membership or privilege restrictions; or for practitioners in a specialty defined as requiring hospital privileges who practice solely in the outpatient setting, there exists a defined referral relationship with a network practitioner of similar specialty at a network HDO who provides inpatient care to members needing hospitalization
- No new (since previous credentialing review) history of or current use of illegal drugs or substance use disorder
- No impairment or other condition that would negatively impact the ability to perform the essential functions in their professional field
- No new (since previous credentialing review) history of criminal/felony convictions, including a plea of no contest
- Malpractice case history reviewed since the last CC review. If no new cases are identified since the last review, malpractice history will be reviewed as meeting criteria. If new malpractice history is present, then a minimum of the last five years of malpractice history is evaluated, and criteria consistent with initial credentialing is used.
- No new (since previous credentialing review) involuntary terminations from an HMO or PPO
- No new (since previous credentialing review) *yes* answers on attestation/disclosure questions, with exceptions of the following:
  - Voluntary resignation from a hospital or organization related to practice relocation or facility utilization
  - Voluntary surrender of state license related to relocation or nonuse of said license
  - An NPDB report of a malpractice settlement or any report of a malpractice settlement that does not meet the threshold criteria
  - Nonrenewal of malpractice coverage or change in malpractice carrier related to changes in the carrier's business practices (no longer offering coverage in a state or no longer in business)
  - Previous failure of a certification exam by a practitioner who is currently board certified or who remains in the five-year post-residency training window

  - Actions taken by a hospital against a practitioner's privileges related solely to the failure to complete medical records in a timely fashion
  - History of a licensing board, hospital, or other professional entity investigation that was closed without any action or sanction
- No quality improvement data or other performance data, including complaints above the set threshold
- Recredentialed at least every three years to assess the practitioner's continued compliance with Simply and CHA standards

* It is expected that these findings will be discovered for currently credentialed network practitioners and HDOs through ongoing sanction monitoring. Network practitioners and HDOs with such findings will be individually reviewed and considered by the CC at the time the findings are identified.

Note: the CC will individually review any credentialed network practitioners and HDOs that do not meet one or more of the criteria for recredentialing.

HDO eligibility criteria

All HDOs must be accredited by an appropriate, recognized accrediting body, or in the absence of such accreditation, Simply and CHA may evaluate the most recent site survey by Medicare, the appropriate state oversight agency, or site survey performed by a designated independent external entity within the past 36 months. If an HDO has satellite facilities that follow the same policy and procedures, Simply and CHA may limit site visits to the main facility. Non-accredited HDOs are subject to individual review by the CC and will be considered for member access need only when the CC review indicates compliance with Simply and CHA standards and there are no deficiencies noted on the Medicare or state oversight review which would adversely affect quality or care or patient safety. HDOs are recredentialed at least every three years to assess the HDO's continued compliance with Simply and CHA standards.

General criteria for HDOs:

- A valid, current, and unrestricted license to operate in the state(s) in which it will provide services to members. The license must be in good standing with no sanctions.
- A valid and current Medicare certification.
- Must not be currently federally sanctioned, debarred, or excluded from participation in any of the following programs: Medicare, Medicaid, or the FEHBP. Note: If, once an HDO participates in Simply and CHA's plan programs or care provider networks, exclusion from Medicare, Medicaid, or FEHBP occurs, at the time of identification, the HDO will become immediately ineligible for participation in the applicable government programs or care provider networks as well as Simply and CHA's other credentialed care provider networks.
- Liability insurance acceptable to Simply and CHA.
- If not appropriately accredited, HDO must submit a copy of its CMS, state site, or a designated independent external entity survey for review by the CC to determine if Simply and CHA's quality and certification criteria standards have been met.

Additional participation criteria for HDO by care provider type:

HDO type and Simply and CHA approved accrediting agent(s)

Facility Type (Medical Care)	Acceptable Accrediting Agencies
Acute care hospital	CIQH, TCT, DNV NIAHO, ACHC, TJC
Ambulatory surgical centers	AAAASF, AAAHC, AAPSF, ACHC, TJC
Birthing center	AAAHC, CABC, TJC
Home health care agencies (HHA)	ACHC, CHAP, DNV NIAHO, TJC, TCT
Home infusion therapy (HIT)	ACHC, CHAP, TCT, TJC
Skilled nursing facilities/nursing homes	CARF, TJC
Durable medical equipment suppliers	TJC, CHAP, TCT, ACHC, BOC, HQAA

Facility Type (Behavioral Health Care)	Acceptable accrediting agencies
Acute care hospital — psychiatric disorders	DNV NIAHO, ACHC, TJC, TCT
Adult family care homes (AFCH)	ACHC, TJC
Adult foster care	ACHC, TJC
Community mental health centers (CMHC)	AAAHC, CARF, CHAP, COA, TJC, ACHC
Crisis stabilization unit	TJC
Intensive family intervention services	CARF
Intensive Outpatient — Mental Health and/or substance use disorder	ACHC, CARF, COA, DNV NIAHO, TJC
Outpatient Mental Health Clinic and/or Licensed Behavioral Health Clinics	CARF, CHAP, COA, ACHC, TJC
Partial Hospitalization/Day Treatment — Psychiatric Disorders and/or Substance Use Disorder	CARF, DNV NIAHO, TJC
Residential Treatment Centers (RTC) – Psychiatric Disorders and/or Substance Use Disorder	CARF, COA, DNV NIAHO, ACHC, TJC
Facility Type (Behavioral Health Care -Rehabilitation)	Acceptable Accrediting Agencies
Acute inpatient hospital — detoxification only facilities	TCT, DNV NIAHO, ACHC, TJC
Behavioral health ambulatory detox	CARF, TJC
Methadone maintenance clinic	CARF, TJC
Outpatient substance use disorder clinics	CARF, TJC, COA,
Acute care hospital — psychiatric disorders	DNV NIAHO, ACHC, TJC, TCT