



Department: Professional and Institutional Relations
 Function: Credentialing

PR-CRED- B002

Credentialing Reconsideration

Effective Date: 04/2013
Last Review Date: 03/2024
Last Revision Date: 02/2017
Next Review Date: 03/2025
Owner: Credentialing Manager
Approving Authority: Corporate Credentials Committee

Background

This document outlines the process BCBSKS will follow when a Provider/Facility (to be referred to as Applicant herein) applies for reconsideration after being denied/cancelled by the BCBSKS Corporate Credentials Committee (Committee).

Procedure

An "**Applicant**" is any Provider or Facility being credentialed or re-credentialed by BCBSKS.

I. Right to Reconsideration Process:

- A. BCBSKS will notify the Applicant in writing within 10 business days after the Committee determines to cancel or deny. The written notice of denial/cancellation shall be completed by the Director of Professional Relations and sent by secure email or certified mail to the Applicant. The written notice will include an explanation for the denial/cancellation and a copy of BCBSKS credentialing criteria. Such notification shall include a copy of the reconsideration rights set forth herein. BCBSKS will take no action regarding such Applicants (other than in the case of refusing to accept the Applicants initial application) until reconsideration rights are exhausted.
- B. Circumstances When Reconsideration/Appeal is not Available:
 1. If the Committee denies/cancels credentialing status for an Applicant because one or more of the following reasons, the reconsideration and appeal process described below will not be available to such Applicant.
 - a) Applicant's Professional License is not at full clinical scope of practice.
 - b) Limitations or Restrictions against the Applicant's DEA registration.
 - c) Applicant is unable to supply credentialing staff with documentation of successful completion of at least three years post-graduate training or equivalent work experience.
 - d) Applicant is currently subject to any sanctions imposed by any CMS program or by the Federal Employee Health Benefit Program, including but not limited to being excluded, suspended, or otherwise ineligible to participate in any state or federal healthcare program.
 2. If an Applicant's regulatory board suspends or revokes his/her license, that Applicant's BCBSKS network contract is cancelled by operation of the terms

of the contract. When credentialing staff members become aware of such

suspension or revocation, they shall notify the Committee, but the Committee is not required to take any specific action since the Applicant's contract will terminate of its own accord. Credentialing staff shall also notify the appropriate internal departments of such suspension or revocation to ensure that appropriate administrative action is taken.

Applicants do not have reconsideration rights where there is no dispute as to whether Applicants satisfy all eligibility criteria or when BCBSKS has denied the application for business reasons.

Applicants who disagree with BCBSKS's determination to deny/cancel their credentialing status, or limit their practice, or grant provisional approval as contracting Applicants must exhaust the following reconsideration process.

II. Reconsideration

A. Notice to the Right of Reconsideration

This process consists of the original review of the Applicants credentials at the time of application and at the time of re-credentialing occurring at a minimum of every three years. Credentialing criteria are available on BCBSKS's website <http://www.bcbsks.com>.

III. Committee Actions:

- A. The Committee may approve, deny, cancel, or pend for additional information, or in the case where the file contains complex malpractice claims or indication of potential substandard clinical practice patterns, refer the file to external peer Applicant for input.
- B. The Committee may also request additional clinical peer input related to standards of care for a particular specialty and the peer reviewer will be a Provider in the same specialty.
 - Reports and recommendations obtained from external peer review will be reviewed and the documentation kept in the file.
- C. The Committee may approve an application for up to three years or may choose to limit the approval to less than three years if the Committee determines that more frequent review is necessary.
- D. Files pended for additional information may not be pended for more than 60 days. If the information cannot be obtained within the timeframe, the Committee may choose to administratively deny for failure to complete and comply with the BCBSKS credentialing process. A letter will be sent to the Applicant within 10 business days notifying them that the file was administratively denied for failure to comply. The Applicant can request reconsideration if he/she is willing to submit the requested information

within 30 business days from receipt of the letter and the file documentation remains current and within the 180-day timeframe. Initial Applicants approved participation in the BCBSKS network will receive written notification of approval within 10 days of the Committee's decision.

- E. Re-credentialed Applicant approved continued participation in the BCBSKS network will **not** receive a written notification unless credentialing status changes.

IV. Initial/Re-credentialing Applicant:

- A. The Committee reviews each Applicants credentialing file that fails to meet the BCBSKS Criteria and URAC standards. If an Applicant does not meet the BCBSKS criteria and URAC standards or there is evidence they do not adhere to BCBSKS policies and procedures, the Committee may deny/cancel or restrict participation in the BCBSKS network. A letter will be sent by the Director of Professional Relations and sent by certified mail to the Applicant within 10 business days if the decision results in denial/cancellation or restriction of participation.

V. Reconsideration:

- A. If the Committee denies/cancels or restricts an Applicant's participation status, they will allow the Applicant to resubmit supporting documentation for reconsideration within 30 calendar days from receipt of the letter and the file documentation remains current and within the 180-day timeframe. If the denial/cancellation or restriction is upheld by the Committee, the Applicant may submit a written request for a first level of reconsideration within 30 calendar days of the date BCBSKS sends notice of the denial/cancellation or restriction to the Applicant. The Applicant will be notified within 10 business days following review of the additional information and the decision of the Committee.

VI. First Level Reconsideration Panel:

- A. All disputes are referred to a first-level appeal panel consisting of at least three qualified individuals, of which at least one must be a participating provider who is not otherwise involved in network management and who is a clinical peer of the participating Applicant that files the dispute. BCBSKS will have 60 days from receipt of the First Level Reconsideration request to convene a first level of appeal panel. The Applicant will be notified within 10 business days following review of the additional information and the decision of the Committee.
- B. **Definition of "Panel"**
Each panel of three requires participation of at least one participating provider, who is a clinical peer and not involved with the day-to-day operation of the organization, including participation on other Committees.

VII. Second Level Reconsideration Panel:

- C. If the first-level appeal panel upholds the denial/cancellation or restriction, the

Applicant may submit a written request for a second level appeal. BCBSKS will convene an external second level, three-member, appeal panel consisting of at least one member who must be a contracting provider not otherwise involved in network management and who is a clinical peer of the Applicant who filed the dispute. None of the second level panel may have been members of the first level appeal panel. BCBSKS will have 60 days from receipt of the second level appeal request to convene a second-level appeal panel. The Applicant will be notified within 10 business days following review of the additional information and the decision of the Committee.

The results of the appeals process shall be binding on both the Applicant and BCBSKS subject only to the provision for binding arbitration previously stated in Policy Memo 1.

For every Applicant whose denial or cancellation status is upheld, credentialing staff will report the decision to the Applicant's regulatory board and the National Practitioner Data Bank.

VII. Participating Provider Credentialing Monitoring:

On a monthly basis, all Providers are routinely monitored for any disciplinary actions published by the following organizations:

- Kansas State Board of Healing Arts (KBOHA)
- Kansas State Board of Nursing (KSNB)
- Kansas State Behavioral Sciences Regulatory Board (KSRB)
- Kansas State Board of Examiners in Optometry
- Kansas Dental Board (KDB)
- Health and Human Services/Office of Inspector General (HHS/OIG)
- CAQH Sanction Track Module
- BCBSKS Complaint Database

If an Applicant's regulatory board suspends or revokes his/her license during the appeal process, that Applicant's BCBSKS network contract is canceled by operation of the terms of the contract. When credentialing staff members become aware of such suspension or revocation, they shall notify the Committee, but the Committee is not required to take any specific action since the Applicant's contract will terminate of its own accord. Credentialing staff shall also notify the appropriate internal departments of such suspension or revocation to ensure that appropriate administrative action is taken. Appeal process will be discontinued if Applicant's license is suspended or revoked.



Process Flow Chart *(if applicable)*

Related Forms *(if applicable)*

Validation

Review/Revision Log

<i>Effective Date</i>	<i>Description of Change</i>	<i>Approved By</i>
02/26/2020	Annual Review	Corporate Credentials Committee
03/02/2020	Annual Review	Steering Committee
02/24/2021	Annual Review	Corporate Credentials Committee
03/08/2021	Annual Review	Steering Committee
02/23/2022	Annual Review	Corporate Credentials Committee
03/21/2022	Annual Review	Steering Committee
02/22/2023	Annual Review	Corporate Credentials Committee
03/20/2023	Annual Review	Steering Committee
02/28/2024	Annual Review	Corporate Credentials Committee
04/01/2024	Annual Review	Steering Committee

Associated Documents (e.g., policies, procedures, process, standards)

Document Number	Document Name
PR-CRED-A002	Credentialing Reconsideration