

# EVOLENT HEALTH LLC

## POLICY AND PROCEDURE

POLICY NUMBER: CO.628.E  
 REVISION DATE: 06/22  
 PAGE NUMBER: 1 of 5

**POLICY TITLE:** Staff Credentials Verification  
**DEPARTMENT:** Clinical Operations  
**ORIGINAL DATE:** January 2013

**Approver(s):** Suzanne Price, VP Clinical Operations

**Policy Review Committee Approval Date:** June 30, 2022

**Product Applicability:** mark all applicable products below:

<b>COMMERCIAL</b>	<input type="checkbox"/> HMO <input type="checkbox"/> PPO <i>Products:</i> <input type="checkbox"/> Small <i>Exchange:</i> <input type="checkbox"/> Shop <input checked="" type="checkbox"/> All <input type="checkbox"/> Indiv. <input type="checkbox"/> Indiv. <input type="checkbox"/> Large <i>States:</i> <input type="checkbox"/> GA <input type="checkbox"/> MD <input type="checkbox"/> OH <input type="checkbox"/> TX <input type="checkbox"/> _____
<b>GOVERNMENT PROGRAMS</b>	<input type="checkbox"/> MA HMO <input type="checkbox"/> MA C-SNP <input type="checkbox"/> MA D-SNP <input type="checkbox"/> MSSP <input type="checkbox"/> Next Gen ACO <input checked="" type="checkbox"/> MA All <input checked="" type="checkbox"/> Medicaid <i>States:</i> <input checked="" type="checkbox"/> ALL
<b>OTHER</b>	<input checked="" type="checkbox"/> Self-funded/ASO

**Regulatory Requirements:** NCQA Case Management Standards: CM7E&F: Staffing, Training and Verification. URAC Core 25 c, Medicare Managed Care Manual, Chapter 5, section 20.2.1; Medicare Managed Care Manual, Chapter 13, Sec. 10.2 and Sec 40.1.1; Nurse/Clinical Practice Acts in states where clinical services are provided;

### PURPOSE

The purpose of this policy is to document the process by which Evolent Health:

- Verifies that Clinical Operation's staff have the necessary licensure upon employment and that licensure stays current after initial verification
- Utilizes primary sources to verify licensure
- Monitors clinical staff sanctions and complaints
- Takes action when clinical staff sanctions, complaints, or quality issues are identified.

### DEFINITIONS

**Clinical Staff:** A clinical staff member is an individual who is licensed to treat patients.

**Workday:** Evolent Health Human Resources Information System.

### POLICY

Evolent Health requires all professional employees whose job functions require clinical licensure and/or certifications to hold current and valid professional licensure and/ or certificates that qualify them to perform utilization management or care management functions. In addition, Evolent Health conducts ongoing monitoring for clinical staff sanctions and complaints. This Policy pertains to all clinical staff for whom licensure is required.

## **PROCEDURE**

### **A. Initial Credentials Verification**

1. All professional employees whose job functions require clinical licensure are required to provide valid, current licensure information prior to their initial start date.
2. Licenses are verified during the background (pre-hire) process and will be put into the tracking system (Workday) within 90 days of the new hire start date.
3. Evolent Health verifies clinical licensure in all states where clinical services are conducted. State verification will be done before clinical information is provided to patients and clinical staff.
4. Sanctions validated during the hiring process include accessing FACIS (Fraud and Abuse Control Information Systems). FACIS databases contain adverse actions of individuals and entities sanctioned in the healthcare field. This includes information on disciplinary actions ranging from exclusions and debarments to letters of reprimand and probation. Included in this search is the following:
  - Sanction information from the Office of Inspector General (OIG), the General Services Administration (GSA) and other federal agencies
  - Disciplinary action information from multiple agencies as well as those taken by licensing and certification agencies in all 50 states.
5. As a condition of employment/pre-hire, a background check is also conducted to verify personal information such as: social security number, address history information, education, basic criminal history, etc.
6. Within two weeks of hire, new clinical staff and Human Resources will be advised of the need for specific state licensing. This request will be determined by the location of the client assigned to the new associate.
7. Evolent requires the clinical staff to obtain additional state licenses within 90 days of start date. Clinical staff are not permitted to work with patients in those states until licenses have been obtained and verified by Human Resources.
8. Evolent will pay for all application fees associated with additional state application processes. If additional state licenses are not obtained within the 90-day period,

the licensed professional may not perform any duties related to his or/her licensed professional scope of practice and/or may be required to take paid time off (PTO) or time off without pay until the issue is resolved. If a state takes more than 90 days to complete an application, Evolent will not hold the licensed, professional staff accountable for missing the 90-day timeline.

9. Professional licensure information, along with evidence of primary source verification, is stored in Workday. The individual who verified the credentials information signs or initials the verification.

## **B. Annual Licensure and Certification Review and Renewal**

1. Renewal of licensure and certification is the responsibility of the individual employee. At 90 days prior to expiration of licensure, a member of the Evolent HR team reaches out directly to the employee and requests proof of an updated license.
2. Upon receipt of license and/or certification copy, the license or certification is verified directly with the licensing agency and signed by the individual conducting the verification.
3. Primary source verification of licensure and certification is completed no later than the scheduled expiration date for all license and certification renewals.
4. Human Resources retains these records in -Workday and inputs the renewal dates for each state license required for the associate.

## **C. Licensure/Certification Renewal Failure**

1. Failure to comply with presenting an active, valid license could be cause for termination from the company.
2. If the Human Resources department fails to receive a copy of the renewal prior to or by the expiration of active licensure, or there is an adverse change in the licensure, the Human Resources department will notify the employee's manager and the licensed professional will not perform any duties related to his or/her licensed professional scope of practice until such time licensure is received and validated by Human Resources.
3. The licensed professional may be required to take PTO or time off without pay until an active, valid license is presented to HR and their Manager.

## **D. Ongoing Monitoring for Sanctions, Complaints and Quality Issues**

1. On a monthly basis, Human Resources produces a report of all active employees through SanctionsBase®, a proprietary database that includes administrative and disciplinary actions against healthcare employees. SanctionsBase® searches the Office of Inspector General's (OIG) List of Excluded Individuals/Entities (LEIE) and the System for Award Management (SAM) Excluded Parties List (EPLS), as well as hundreds of other federal and state sources.
2. If a match is discovered, Human Resources will notify the employee and his/her manager. Further investigation into the issue will be conducted with management and HR staff.
3. Complaints and verified quality issues concerning any staff person are reviewed by management staff with the employee at the time of the occurrence or finding.
4. It is the responsibility of the employee to notify management if there is an adverse change in licensure/certification and/or through ongoing monitoring sanction status. Employees must notify their respective managers and Human Resources within one (1) business day after being made aware of any potential or actual adverse change to licensure, certification or sanction status.

**E. Adverse Change in Licensure/Certification and/or Sanction/Complaint/Quality status**

1. The licensed professional will not perform any duties related to his or her licensed professional scope of practice and/or may be required to take PTO or time off without pay until adverse changes in licensure have been remedied.
2. Failure to comply with presenting an active, valid license to his or her Manager, could be cause for disciplinary action, up to and including termination from the company.
3. For complaints, quality issues and sanctions Evolent Health will take appropriate action, up to and including termination, based on the severity of the adverse change and compliance with our client agreements.

**RECORD RETENTION**

Records Retention for Evolent Health documents, regardless of medium, are provided within the Evolent Health records retention policy and as indicated in CORP.028.E Records Retention Policy and Procedure.

## REVIEW HISTORY

DESCRIPTION OF REVIEW / REVISION	DATE REVISED
Added NCQA Citations	03/16
Added CMS Citations	05/16
New template added NCQA and CMS Citations	06/16
Annual Review - HR Reviewed Policy	04/17
Annual Review - HR Reviewed Policy	04/18
Annual Review – HR Reviewed Policy Include Florida and Texas	01/19
Annual Review – HR Reviewed Policy	04/20
Annual Review - HR Reviewed Policy	03/2021
Policy no. changed from CM.PH.010.E to CO.628.E (policy for UM and CM staff)	07/2021
Annual Review, approver updated, reviewed by the Talent team, no updates required	06/2022