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ACL 19-10

Date: November 8, 2019
To: Community-Based Adult Services (CBAS) Center Administrators and Program Directors
From: California Department of Aging (CDA) CBAS Branch
Subject: **All Plan Letter (APL) 19-004: Provider Credentialing / Recredentialing and Screening / Enrollment**

Purpose

The purpose of this All Center Letter (ACL) is to alert CBAS providers about [APL 19-004: Provider Credentialing / Recredentialing and Screening / Enrollment](#)ⁱ which the California Department of Health Care Services (DHCS) distributed to all Medi-Cal managed care health plans (MCPs) on June 12, 2019.

APL 19-004 informs MCPs of their responsibilities for the screening and enrollment, and credentialing and recredentialing of their network providers pursuant to federal regulations. This APL impacts CBAS centers and their staff/subcontractors.

Key Information in APL 19-004

The following information in APL 19-004 impacts CBAS centers and their staff/subcontractors:

1. MCPs must comply with the federal requirements for the screening and enrollment of all MCP network providers, pursuant to [Title 42, Code of Federal Regulations \(CFR\), Part 455, Subparts B and E](#).ⁱⁱ

Title 42, CFR, Part 455, Subpart E "Provider Screening and Enrollment" identifies all of the federal requirements for the screening and enrollment of Medi-Cal providers. In particular, Title 42, CFR, Part 455.410(b) mandates that the "State Medicaid agency must require all ordering or referring physicians or other professionals providing services under the State plan or under a waiver of the plan to be enrolled as participating providers."

2. MCP network providers may enroll through a state-level provider enrollment system such as [PAVE](#)ⁱⁱⁱ developed by DHCS for Medi-Cal Fee for Service (FFS) providers, another state department with a recognized enrollment

pathway identified on the DHCS webpage [Provider Enrollment Options](#)^{iv}, or MCPs may develop their own provider enrollment systems and processes.

3. MCPs have contractual obligations related to credentialing and recredentialing of their MCP network providers, pursuant to [Title 42, CFR, Section 438.214](#).^v

Credentialing is defined as the recognition of professional or technical competence. The credentialing process may include registration, certification, licensure, and/or professional association membership, and ensures that providers are properly licensed and certified as required by state and federal law.

MCPs must ensure that each of its network providers is qualified in accordance with the current legal, professional and technical standards, and is appropriately licensed, certified or registered, and it must perform credentialing and recredentialing activities of their network providers on an ongoing basis. These requirements apply to both existing contracting network providers as well as prospective network providers.

The MCPs' screening and enrollment requirements are separate and distinct from their credentialing and recredentialing processes. Refer to the APL for more details.

How APL 19-004 Impacts CBAS Center Staff and Subcontractors

Prior to APL 19-004, only CBAS centers were required to enroll as Medi-Cal providers and contract with MCPs to provide CBAS services to eligible MCP beneficiaries. CDA is responsible for the screening and enrollment of CBAS centers but not CBAS center staff/subcontractors.

However, APL 19-004 expands the scope of providers required to enroll as Medi-Cal providers in MCP provider networks, even if these providers do not directly bill Medi-Cal for the services they provide. The specific CBAS center staff/subcontractors impacted by these requirements include:

- (1) Licensed Clinical Social Worker, (2) Licensed Marriage and Family Therapist, (3) Physician, (4) Occupational Therapist, (5) Physical Therapist, (6) Speech Language Pathologist.

Per APL 19-004, the MCPs are responsible for ensuring that all providers furnishing services to Medi-Cal MCP beneficiaries are screened and enrolled in the Medi-Cal program. MCPs are also responsible for verifying the credentials of their network providers, which the MCP may do or they may delegate this responsibility to the CBAS center as long as the MCP conducts proper oversight.

While DHCS, CDA, MCPs, CBAS centers and the CBAS staff/subcontractors all share different responsibilities regarding the screening, enrollment, credentialing and recredentialing of CBAS center staff/subcontractors, the responsibility for hiring CBAS

staff and subcontractors who meet the qualifications according to state law and regulations remains with CBAS centers.

Next Steps

The CBAS Branch strongly encourages all CBAS center Administrators/Program Directors to reach out to the MCPs with which your center contracts to (1) determine how the MCPs will implement the requirements identified in APL 19-004 and (2) clarify the MCPs' expectations of your CBAS center and staff/subcontractors to comply with the federal screening and enrollment, and credentialing and recredentialing requirements. The following are some questions to use as a guide in discussions with the MCPs with which your center contracts:

1. Will the MCP provide specific guidance on how it plans to implement the requirements identified in APL 19-004?
2. What does the MCP expect the CBAS center administrator and staff/subcontractors to do to comply with the federal screening/enrollment and credentialing/rec credentialing requirements?
3. What screening and enrollment system does the MCP want the CBAS center staff/subcontractors to use to enroll as providers? The DHCS PAVE system, another state-level enrollment system, or will the MCP develop its own provider enrollment system?
4. Will the MCP require the CBAS center to include any additional information on their claim forms as the result of these new requirements?

CDA will continue to be in communication with DHCS about the implementation of APL 19-004. As of date, we have not received information from the MCPs as to how they plan to implement the requirements in APL 19-004 that impact CBAS centers and staff/subcontractors. The CBAS Branch will keep CBAS providers informed via the *CBAS Updates* newsletter and, if needed, an additional ACL about any new information learned.

Questions

Please contact the CBAS Branch if you have any questions: (916) 419-7545; cbascda@aging.ca.gov.

ⁱ APL 19-004 is available at:

<https://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2019/APL19-004.pdf>

ⁱⁱ 42 CFR, Part 455, Subparts B and E, is available at:

<https://www.ecfr.gov/cgi-bin/text-idx?SID=3471319414e845a757a46ec42cde2b72&mc=true&node=pt42.4.455&rgn=div5>

iii The PAVE webpage is available at:

<https://www.dhcs.ca.gov/provgovpart/Pages/PAVE.aspx>

iv The Provider Enrollment Options webpage is available at:

<https://www.dhcs.ca.gov/provgovpart/Pages/Provider-Enrollment-Options.aspx>

v 42 CFR, Part 438.214 is available at:

[https://www.ecfr.gov/cgi-bin/text-](https://www.ecfr.gov/cgi-bin/text-idx?SID=5410c120a60dd3ed2c74743076ff2e7a&mc=true&node=pt42.4.438&rgn=div5#se42.4.438_1214)

[idx?SID=5410c120a60dd3ed2c74743076ff2e7a&mc=true&node=pt42.4.438&rgn=div5#se42.4.438_1214](https://www.ecfr.gov/cgi-bin/text-idx?SID=5410c120a60dd3ed2c74743076ff2e7a&mc=true&node=pt42.4.438&rgn=div5#se42.4.438_1214)