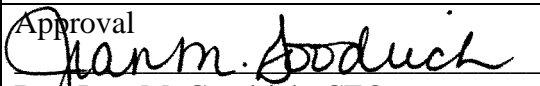


Chapter 1: General Policies & Procedures	Effective Date: 11/1/18
Section 1.2: Provider Network	Replaces Policies Dated: 3/28/2016; 1/19/2015
Policy 1.2.3: Credentialing Records and Confidentiality	Board Policy Reference: 02-001
<p>Approval              By: Jean M. Goodrich, CEO            Date: 11/1/18</p>	Responsibility: Medical Director; Strategic Alliance Director

**PURPOSE:**

To ensure confidentiality of all aspects of the credentialing process. Each credentialed provider will have an individual record maintained that will be kept confidential. Each file will include at least the following:

- The initial credentialing application and supporting documentation.
- All subsequent re-credentialing application(s).
- Information gained through primary source verification and other pertinent information utilized in the credentialing decisions.

**POLICY:**

Credentialing Program, Provider Network Management – It shall be the policy of Summit Pointe to ensure the credentialing and re-credentialing of behavioral health practitioners whom they employ, contract with, and organizational providers, who fall within their scope of authority. The credentialing process will be completed in compliance with 42 CFR 422.204 and NCQA credentialing standards. Under this policy, employed and contracted practitioners and credentialed organizations are defined as providers within the Summit Pointe Provider Network.

Summit Pointe will not discriminate against any provider solely on the basis of race, ethnic/national identity, gender, age, sexual orientation, licensure, registration or certification. Summit Pointe will not discriminate against health care professionals who serve high-risk populations or those that specialize in the treatment of conditions that require costly treatment.

**DEFINITIONS:**

Credentialing Committee - A committee of professional peers as appointed by the Summit Pointe Chief Executive Officer whose role is to make recommendations and final approval regarding credentialing and re-credentialing decisions for inclusion in the Summit Pointe Provider Network for designated disciplines and service provisions. Summit Pointe may

conduct credentialing verification activities for individuals/organizations that do not have to be approved by the Credentialing Committee.

**PROCEDURES / REQUIREMENTS:**

**I. Standards and Guidelines:**

Credentialing files and information, along with minutes and records of the Credentialing Committee meetings, will be maintained in a secure environment with limited access.

Summit Pointe will maintain confidentiality of all aspects of its credentialing process. Each credentialed provider will have an individual record maintained that will be kept confidential.

Credentialing records, including Credentialing Committee meeting minutes, will be kept for a minimum of seven (7) years after the termination of employment or contractual relationship. Hard copies of credentialing materials may be destroyed by shredding after being kept for the minimum of seven (7) years. Electronic files may be kept indefinitely.

Copies, hard and/or electronic, records will be stored in a secure format. Hard copy records will be kept in locked cabinets. Electronic records will be maintained in password protected environments. Only Summit Pointe designated staff who have responsibilities associated with credentialing shall have access to these records. At no time will other staff have access to these records. Use of temporary personnel will be allowed only after they have received proper training on confidentiality of records and have signed a confidentiality statement. Training will be documented.

Electronic records will be password protected with passwords to be updated according to organization protocols. Computers will lock when the employee walks away from their station. Only authorized personnel, on a need to know basis, will be granted access to the electronic credentialing files. Access is approved upon hire by the designated Senior Leadership member.

Any provider with delegated credentialing functions will maintain their records with the same confidential aspects and will be monitored during on-site inspections to ensure the confidentiality of records being maintained.

Credentialing Committee Members with access to the credentialing information will be required to complete confidentiality training and sign a confidentiality statement to preserve confidentiality. This training will be documented.

Staff members with access to credentialing information will be required to undergo training regarding the confidentiality of information. The training will be documented.

During the course of completing the responsibilities of the credentialing process, Summit Pointe staff or Credentialing Committee Members may encounter individually identified health information. If this occurs, employees and Committee Members may only use the information for purposes necessary to conduct Summit Pointe business

and are required to preserve the confidentiality. This will be included in the confidentiality statement that is signed regarding performing as a Committee Member.

**REFERENCES:**

- 42 CFR 422.204
- NCQA CR 1, CR 2

**ATTACHMENTS:**

- **Confidentiality Statement Form**