



COUNTY OF SANTA CLARA
Behavioral Health Services
 Supporting Wellness and Recovery

May 16, 2022

Dear County Contract Providers:

Over the past several weeks we have heard your concerns about delays in the onboarding and credentialing processes for your new hires resulting in delays for those providers to see patients and bill for services. Since we first became aware of your concerns, BHSD and VHP have been working together to understand the issues that may be impacting performance and have recommended the implementation of the following process improvements.

Additionally, VHP has conducted a root cause analysis of a sampling of 31 applications from one agency. The findings from the audit have informed the process changes noted below.

Findings	Process Improvements
VHP is unable to clearly distinguish the “new” from “grandfathered providers.	CCPs to clearly indicate in the Subject Line of the email to VHP “New Application.” BHSD to provide a consolidated list of all grandfathered providers to VHP.
VHP to develop an escalation process for new applicants.	VHP developed and implemented an intake and triage process to categorize all new applicants as a “Level 1” priority. Level 1 applicants will be credentialed within 14 days of receipt of an application that is complete and ready for processing.
CCPs are submitting applications to VHP with a start date in less than 14 days of application receipt date.	CCPs to evaluate modifications to their submission timeline to allow VHP 14 calendar days to complete the credentialing process for new applicants.
Evaluate the inventory to determine how many applications for new providers exist and establish a turnaround time (TAT) for completion.	198 new providers are “in process.” 42 of those applications are pending approval the week of May 9, 2022. The balance of the “clean applicants” (i.e., providers who meet minimum qualifications for participation in the BHSD network) who have submitted applications that are complete and ready for processing will be approved by May 30, 2022. BHSD has approved overtime to ensure completion of the remaining 156 clean, complete application within this timeline.



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Decrease the timeline from completed credentialing date to approval date for clean applicants.	VHP has already Instituted weekly approvals of clean applications by Drs. Ho and Poon in addition to the monthly Credentialing Committee meeting.
Increase transparency to the CCPs related to applications received and the status of the E2E credentialing/onboarding process.	Monitoring tools and monthly reports are under development.
There appears to be a delay in VHP receiving both grandfathered and new applicants' Unicare IDs, which inhibits a CCP's ability to request reimbursement for billable services.	BHSD to work with the IT team to improve the TAT for completion of Unicare IDs for both new and grandfathered providers.
Due to the significant number of applications received by VHP between March and April 2022, evaluate the TAT for grandfathered providers. The inventory of grandfathered providers awaiting credentialing is 612.	VHP will complete the credentialing of all grandfathered providers who are clean and have submitted complete applications between March and April 2022 by December 31, 2022.

There was a request to “back date” the approval date (i.e., start date) based on process delays. As promised, BHSD has consulted with both the Office of the County Counsel and County Compliance. During their review it was determined that modifying the approval date would not be compliant with the requirements and standards promulgated by the Department of Health Care Services (DHCS) and the National Committee for Quality Assurance. Consequently, we BHSD will further explore the reimbursement issue and determine potential options.

As mentioned above, VHP's sample review identified that new providers may have commenced rendering billable services prior to the 14 days allotted for credentialing. Non-credentialed providers should not be rendering services that require them to be credentialed. BHSD has allowed each agency to determine whether it is appropriate for the new applicant to render other non-billable services while waiting for the credentialing process to be complete. Delays in processing the credentialing applications for “grandfathered” providers does not affect their ability to bill for services.

To avoid unnecessary delay, please ensure providers have an NPI and completed Medi-Cal enrollment in PAVE (if applicable) when applying for credentialing as this is required for them to bill for services being rendered. If there is no NPI and/or Medi-Cal certification (if applicable) for the provider, this will prolong the process of them being credentialed. You can find the list of provider types supported in PAVE website (see link below). Also, providers applying to be a Mental Health Rehabilitation Specialist (MHRS) are required to have an MHRS certificate from BHSD prior to Credentialing. If this certificate is not submitted with the credentialing application, this will also



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delay the process. Lastly, if you have questions about a provider's Unicare ID, please submit your inquiry to BHSD's Business Office email.

BHSD and VHP are committed to continued process improvements leading to timely credentialing. Moreover, BHSD plans to conduct a comprehensive review of the E2E credentialing and onboarding processes to evaluate if improvements are required in the areas of provider set-up and within the BHSD Business Office. BHSD plans to implement a monitoring program to determine what enhancements should be undertaken to establish a robust, timely and scalable process that meets the expectations of the CCPs and is compliant with regulatory and accreditation standards of performance.

Sincerely,

DocuSigned by:

Edwin Poon

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Edwin Poon, Ph.D.
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PAVE Provider Types link:

https://www.dhcs.ca.gov/provgovpart/Documents/PAVE_Project_for_Provider_Enrollment_Division/Provider_Types_Supported_in_PAVE.pdf