

SUBJECT: CLEAN PRACTITIONER FILES SECTION: CREDENTIALING POLICY NUMBER: CR-03	EFFECTIVE DATE: 5/1/2021
<i>Applies to all products administered by the Plan except when changed by contract</i>	

Policy Statement: The Plan requires all practitioners to satisfy all credentialing policies, including those documented in the Initial Credentialing Policies, CR-01 and CR-01A and Recredentialing Policies CR-02 and CR-02A. All practitioners are required to meet the criteria within these policies prior to and while continuing to treat the Plan’s members.

The Plan has created a policy that sets forth a process by which the Plan can review and approve “clean files”, and the criteria for approval under this policy. For purposes of this policy, a “Clean File” is a credentialing file that meets the Plan’s criteria for participation and has no element that may need Corporate Credentialing Committee (“Committee”) review.

The Plan has established a process to review practitioner files that do not contain any adverse findings. Criteria shall be defined for meeting the Clean File standard. The Credentials Committee need not review and render an individual decision about each of these practitioners. Clean Files shall be available to the Committee upon request.

To qualify as a Clean File, the practitioner’s application must meet the standards for completeness as set forth by the Plan’s credentialing policies, and must contain no information that the Plan concludes, in its sole discretion, warrants a full review by the Committee prior to approval of the application. Such information may include, without limitation, prior legal, regulatory or disciplinary actions, license restrictions, actual or potential professional misconduct, fraud, false claims or unacceptable billing practices, sanctions/exclusions from any federal or state health insurance program, or terminations from the provider network of any third party payor, including the Plan.

In addition to the above, the new applicant or recredentialled practitioner must meet all the following criteria which will be verified using primary sources in accordance with the Plan’s Credentialing Policies:

- a. The applicant/practitioner has completed an updated CAQH or Plan recognized credentialing application, which has been attested to within the last 90 days and has answered all questions positively (meaning a response that requires no explanation);
- b. The applicant/practitioner has been granted privileges at the hospital where he/she designated as his/her primary admitting facility;
- c. The applicant/practitioner is board admissible or board certified, as required by the Plan;

- d. The applicant/practitioner has an active permanent license/certification in their practicing state;
- e. The applicant/practitioner has an active DEA registration, as required by the Plan;
- f. The applicant/practitioner has the appropriate malpractice insurance coverage to meet the Plan's requirements;
- g. The applicant/practitioner, if seeking to be credentialed as a primary care physician, has 24 hour 7 day per week in-network coverage; and
- h. There are no suggestions in the verified materials of potential problems, such as, prior malpractice or disciplinary actions, licensure restrictions, or any other information that requires further investigation.

Process:

If upon the Plan's review of a practitioner's application for credentialing, the Plan, through a Credentialing Specialist, determines that the practitioner meets the criteria set forth above:

- a. The file will be submitted to a Plan Medical Director for review and decision as to whether the practitioner's application for (re)credentialing constitutes a Clean File and would be approved pursuant to this policy. The Plan's Medical Director's review and approval will be evidenced by a handwritten signature or handwritten initials.
- b. If the Plan's Medical Director in his/her sole discretion, determines that the application warrants review by the Credentials Committee the file will automatically be reviewed for approval under the process set forth in Credentialing Policies(CR) 01, 01A, 02 and 02A. The Plan's decision that a practitioner's application does not satisfy the Plan's clean file criteria is not subject to appeal or review by the practitioner.
- c. All practitioners credentialed under this policy will be submitted for final approval to the Committee at its next regularly scheduled meeting.
- d. A Plan representative will notify the practitioner of the Committee's decision in writing within thirty (30) days of approval. If approved, such approval shall be for three (3) years.

Cross Reference: CR-01, CR-01A, CR-02, CR-02A

Committee Approvals

Corporate Credentials Committee: 4/21/2021, revised 4/19/2023