



KERN HEALTH SYSTEMS POLICY AND PROCEDURES			
Policy Title	Ongoing Monitoring & Sanction Activity Review	Policy #	23.22-P
Policy Owner	Quality Performance/Contracting	Original Effective Date	10/01/2024
Revision Effective Date		Approval Date	10/29/2024
Line of Business	<input checked="" type="checkbox"/> Medi-Cal <input type="checkbox"/> Medicare		

I. PURPOSE

To ensure all contracted providers are absent from being identified as ineligible, suspended, sanctioned, debarred, excluded, restricted, or opted out of Federal and State Programs. Additionally, in accordance with Welfare and Institutions Code 14043.61, subdivision (a) a contracted provider shall be subject to suspension if claims for payment are submitted for services, goods, supplies, or merchandise provided, directly or indirectly to a Medi-Cal beneficiary, by an individual or entity that is suspended, excluded or otherwise ineligible because of a sanction to receive, directly or indirectly, reimbursement from the Medi-Cal program and the individual or entity is listed on the Suspended and Ineligible Provider List, published by the department to identify suspended and otherwise ineligible providers, or on any list published by the Federal Office of Inspector General regarding the suspension or exclusion of individuals or entities from the federal Medicare and Medicaid programs, to identify suspended, excluded, or otherwise ineligible providers.

II. POLICY

- A. Kern Health Systems (KHS) requires verification at initial, recredentialing and monthly thereafter, of practitioners and organizational providers ensuring all contracted providers are absent from being identified as ineligible or suspended, sanctioned, debarred, excluded, restricted, or opted out of Federal and State Programs.

III. DEFINITIONS

TERMS	DEFINITIONS
Adverse Event	Adverse Event may include, but are not limited to, an injury that occurs while a member is receiving healthcare services from a provider; criminal indictments or convictions; media alerts; notification from other health plans; 805 Reports filed

	with the Medical Board of California; NPDB clinical privilege actions; pattern or trend of quality of care cases filed against practitioner.
Complaint	A complaint is the same as a Grievance. When KHS is unable to distinguish between a Grievance and an inquiry, it shall be considered a Grievance.
DHCS	Department of Health Care Services (California)
Grievance	A Grievance is an expression of dissatisfaction about any matter other than an Adverse Benefit Determination. Grievances may include, but are not limited to, the quality of care of services provided, aspects of interpersonal relationships such as rudeness of a provider or employee, and the beneficiary’s right to dispute an extension of time proposed by KHS to make an authorization decision.
MBC	Medical Board of California
OIG	HHS Office of Inspector General
Opt Out Affidavits	CMS Opt Out Affidavits – A list of practitioners who are currently opted out of Medicare
RPD	DHCS Restricted Provider List
SAM	System for Award Management

IV. PROCEDURES

A. The following procedure will be followed in reviewing the sanction reports:

1. Primary source verification of Medicare and Medicaid sanction activity is obtained from:
 - a. The Office of Inspector General (OIG)
 - b. The System for Award Management (SAM) formerly the Excluded Parties List System (EPLS)
 - c. DHCS Medi-Cal Provider Suspended and Ineligible List (S&I)
 - d. DHCS Restricted Provider List (RPD)
 - e. CMS Opt Out Affidavits (CMS Opt Out)
 - f. National Practitioner Data Bank (NPDB) Continuous Query upon receipt.

2. Primary source verification of California state licensure including licensure status, public actions, and 805 reports, as applicable, is obtained from the appropriate California licensing board at the time of initial, recredentialing and upon license expiration/renewal. During initial and recredentialing a record of review of the sanction reports and findings is maintained in the Provider’s KHS electronic credentials.

3. Ongoing monitoring of providers in-between credentialing and recredentialing cycles is accomplished by reviewing the reports listed below relevant to the current provider types within the KHS Provider Network. The Credentialing Staff receives information when sanctions are filed against a provider and checks these providers against the KHS Network. Reports that must be downloaded due to size, are conducted through the KHS Business Intelligence “sweep” auto-report compared against all providers listed in the Symplr Credentialing database (Participating Providers) and providers in the QNXT database (Participating and Non-Participating) these auto-reports include OIG, SAM, and Medi-Cal Suspended & Ineligible List.

Reports are reviewed within thirty (30) days of release (published/posting date if available), unless otherwise noted that there is no release date. If the reporting entity does not publish sanction information on a set schedule or published date, KHS Credentialing Staff will do one of the following:

- a. Record the “date reviewed” on the document and indicate there is no release/published date.
- b. Query the information at least every six (6) months if the reporting entity does not publish a sanctions report; or
- c. KHS utilizes the sanction alert subscription service through the National Practitioner Data Banks Continuous Query for all credentialed licensed independent practitioners.

4. Ongoing Monitoring Reports for Current Provider Types

- a. Medical Board of California (<https://www.mbc.ca.gov/>) – KHS subscribes to e-mail notifications of accusations, license suspensions, restrictions, revocations, or surrenders for physicians and surgeons licensed by the MBC. *
- b. Osteopathic Medical Board of California (https://www.ombc.ca.gov/enforcement/enforcement_actions.shtml)
KHS subscribes to e-mail notifications and reviews the website monthly for published enforcement and disciplinary action reports. *
- c. Podiatric Medical Board of California (<https://pmbc.ca.gov/consumers/dispsumm.shtml>)
KHS reviews the website monthly for published enforcement and disciplinary action reports for all doctors of Podiatric Medicine monthly. *
- d. California Board of Psychology (<https://www.psychology.ca.gov/>) – KHS subscribes to e-mail notifications and reviews the website monthly for published enforcement and disciplinary action reports.
- e. California Board of Registered Nursing – KHS utilizes the National Practitioner Data Bank (NPDB) Continuous Query process as a mechanism to receive disciplinary actions for Nurse Practitioners. *
- f. Additional Boards and Bureaus included in monthly monitoring: Acupuncture Board of California, Behavioral Health Science Board of California, Chiropractic Examiners Board of California, California Board of Naturopathic Medicine, California Board of Optometry,

Board of California Pharmacy, Physician Assistant Board of California, Board of California Psychology and Speech-Language Pathology and Audiology and Hearing Aid Dispenser Board of California. *

- g. HHS Office of Inspector General
(<https://exclusions.oig.hhs.gov/?AspxAutoDetectCookieSupport=1>) – KHS subscribes to email notifications alerts when new sanction reports have been posted. OIG reports are downloaded from their website monthly for review. *
- h. DHCS Medi-Cal Provider Suspended and Ineligible List
(<https://data.chhs.ca.gov/dataset/provider-suspended-and-ineligible-list-s-i-list/resource/48630a37-b5ba-4d3d-af54-e82b30e658a0>) – KHS downloads the newest report from their website monthly for review. *
- i. DHCS Restricted Provider List - KHS downloads the newest report from their website monthly for review. *
 - i. *No excluded, ineligible, sanctioned, debarred, or suspended providers qualify for Network membership or continued membership. (Source: Medicare Managed Care Manual, Chapter 6 § 60.2; DHCS All Plan Letter APL 19-004)
- j. CMS Medicare Opt-Out Physicians, Northern and Southern California
(<https://data.cms.gov/Medicare-Enrollment/Opt-Out-Affidavits>) – KHS downloads the newest report from their website monthly for review.*
 - i. *No prospective or current KHS Provider shall qualify for Network membership or continued membership if provider has opted-out of the CMS Medicare Program. (Source: Medicare Managed Care Manual: Chapter 6 § 60.2)
- k. Complaints, Grievances and Adverse Events (related to quality of care) – At a minimum, information on complaints, grievances or adverse events will be reviewed at least once every six (6) months pursuant to Policy and Procedure #2.70-I Potential Quality of Care Issue (PQI), Section IV. PQI Review Process, Section K. Tracking and Trending. Complaints, grievances, and adverse events (quality of care related) are reviewed with the Chief Medical Officer, or designee, for appropriate action and follow-up which may include corrective action plans, education or counseling of the provider and when applicable, referral to the Physician Advisory Committee.
- l. Performance Monitoring for Recredentialing – Additionally, recredentialing for all providers shall include performance monitoring data from quality improvement activities, utilization management, member services complaints/grievances and compliance activities. The Physician Advisory Committee monitors the performance and outcomes of practitioners. (Source: Medicare Managed Care Manual, Chapter 6 § 60.3; DHCS All Plan Letter (APL) 19-004 and Exhibit A, Attachment 4 of Plan Contract)

B. Reporting and Interventions

- 1. All sanctions, disciplinary and adverse actions are reported immediately to the KHS Chief Medical Office and/or KHS Chief Executive Officer. The KHS Chief Medical Office and/or KHS Chief

Executive Officer shall determine if immediate action is warranted. All sanctions and disciplinary actions will be reported to the next regularly scheduled Physician Advisory Committee meeting for appropriate action and follow-up which may include, but not limited to the course of action pursuant to Policy and Procedure 4.48-P Disciplinary Action such as corrective action plans, education or counseling of the provider when warranted.

2. If a Provider is identified on the Medicare Opt-Out listing or is actively excluded, ineligible, sanctioned, debarred or suspended on the OIG Report, Medi-Cal Suspended/Ineligible List or DHCS Restricted Provider List, the provider will be deactivated from the KHS Provider Network and notified immediately of their ineligibility for new or continued network participation and membership.
3. Record of verifications shall include the published report date or website date of verification (if there is no new report or a new published date) and initials of KHS Credentialing Staff who completed the verification. This information is saved in the providers electronic credential file and recorded on the file processing checklist for initial and recredentialing. Monthly monitoring reports, conducted by KHS Credentialing Staff, are kept electronically by month of review and reported to the KHS Compliance Department’s Fraud Waste and Abuse Committee

V. ATTACHMENTS

Attachment A:	HICE Ongoing Monitoring Review Tool 2024
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VI. REFERENCES

Reference Type	Specific Reference
Other	National Committee of Quality Assurance Credentialing Standards CR.5 Ongoing Monitoring & Interventions 2023
Regulatory	Medicare Managed Care Manual, Chapter 6 § 60.3; Medicare Managed Care Manual: Chapter 6 § 60.2
All Plan Letter(s) (APL)	DHCS All Plan Letter (APL) 19-004 and Exhibit A, Attachment 4 of Plan Contract.
Other KHS Policies	KHS Policy and Procedure #2.70-I Potential Quality of Care Issue (PQI)

VII. REVISION HISTORY

Action	Date	Brief Description of Updates	Author
Effective	10/01/2024	New policy created to outline additional details for existing monitoring/sanction reviews related to regulatory requirements.	Y.H. QP/Contracting

VIII. APPROVALS

Committees Board (if applicable)	Date Reviewed	Date Approved
Physician Advisory Committee (PAC)		9/4/2024
Board of Directors (BOD)		10/17/2024

Regulatory Agencies (if applicable)	Date Reviewed	Date Approved
Choose an item.		

Chief Executive Leadership Approval *		
Title	Signature	Date Approved
Chief Executive Officer		
Chief Medical Officer		
Chief Operating Officer		
Choose an item.		
*Signatures are kept on file for reference but will not be on the published copy		



KERN HEALTH SYSTEMS

Policy and Procedure Review

KHS Policy & Procedure: 23.22-P, Ongoing Monitoring and Sanction Activity Review

Reason for revision: N/A. New policy developed to meet monitoring and sanction activity requirements.

Director Approval		
Title	Signature	Date Approved
Jake Hall Senior Director of Quality Performance and Contracting		

Date posted to public drive: _____

Date posted to website ("P" policies only): _____

Ongoing Monitoring Auditor Review List
Kern Health Systems

Licensing Board	Degree/Board	Frequency	Sanctions Alert Service/Web Crawler/Software Name of Alert Service	Jan					Feb					Mar				
				Publication Date	Review Date	Reviewer	# of Days	Findings	Publication Date	Review Date	Reviewer	# of Days	Findings	Publication Date	Review Date	Reviewer	# of Days	Findings
CA Board of Chiropractic Examiners *	DC	MO		*			Publication Date		*			Publication Date		*			Publication Date	
Dental Board of California *	DDS	MO		*			Publication Date		*			Publication Date		*			Publication Date	
Osteopathic Medical Board of CA	DO	QTRLY or email subscription					0					0					0	
Board of Podiatric Medicine	DPM	MO					0					0					0	
Medical Board of CA	MD	E-mail subscription, Monthly e-mails					0					0					0	
Acupuncture Board	LAC, AC	MO					0					0					0	
CA Board of Optometry	OD	QTRLY					0					0					0	
Board of Occupational Therapy *	OT, OTA	MO		*			Publication Date		*			Publication Date		*			Publication Date	
Physician Assistant Committee *	PA, PAC	MO		*			Publication Date		*			Publication Date		*			Publication Date	
Physical Therapy Board of CA *	PT	MO		*			Publication Date		*			Publication Date		*			Publication Date	
Speech-Language Pathology & Audiology Board *	SP, AU	QTRLY		*			Publication Date		*			Publication Date		*			Publication Date	
Board of Behavioral Science	LCSW, MFCC, MFT, LPCC, etc.	Monthly - Must subscribe to get updates, or conduct individual queries on a QTRLY basis					0					0					0	
Board of Psychology	Ph.D, PsyD	Must subscribe to receive monthly reports.					0					0					0	
CA Board of Registered Nursing *	RN, NP, CNM, etc.	Monthly		*			No Publication Date		*			No Publication Date		*			No Publication Date	
Organization/Agency	Report	Frequency		Jan			Feb			Mar								
				Publication Date	Review Date	Compliant	Findings	Publication Date	Review Date	Compliant	Findings	Publication Date	Review Date	Compliant	Findings	# of Days	Findings	
Medicare Opt-Out	https://www.CMS.gov	QTRLY				0										0		
Medicare/ Medicaid Sanctions	OIG	MO				0										0		
Medi-Cal Suspended/Ineligible Provider	Medi-Cal	MO				0										0		
DHCS Restricted Provider List	DHCS RPD	Secure Access YH																
SAM (System for Award management) formerly EPLS	https://www.SAM.gov - Individuals & organizations debarred from participating in government contracts	MO				0										0		
* Board does not provide a publication date. Enter date of review																		

Ongoing Monitoring Auditor Review List
Kern Health Systems

Licensing Board	Degree/Board	Frequency	Apr				May				Jun						
			Publication Date	Review Date	Compliant	Findings	Publication Date	Review Date	# of Days	Findings	Publication Date	Review Date	# of Days	Findings			
CA Board of Chiropractic Examiners	DC	MO	*			Publication Date		*			Publication Date		*			Publication Date	
Dental Board of California	DDS	MO	*			Publication Date		*			Publication Date		*			Publication Date	
Osteopathic Medical Board of CA *	DO	QTRLY or email subscription				0					0					0	
Board of Podiatric Medicine *	DPM	MO				0					0					0	
Medical Board of CA	MD	E-mail subscription, Monthly e-mails				0					0					0	
Acupuncture Board *	LAC, AC	MO				0					0					0	
CA Board of Optometry *	OD	QTRLY				0					0					0	
Board of Occupational Therapy	OT, OTA	MO	*			Publication Date		*			Publication Date		*			Publication Date	
Physician Assistant Committee	PA, PAC	MO	*			Publication Date		*			Publication Date		*			Publication Date	
Physical Therapy Board of CA	PT	MO	*			Publication Date		*			Publication Date		*			Publication Date	
Speech-Language Pathology & Audiology Board	SP, AU	QTRLY	*			Publication Date		*			Publication Date		*			Publication Date	
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Organization/Agency	Report	Frequency	Apr				May				Jun						
			Publication Date	Review Date	Reviewer	Compliant	Findings	Publication Date	Review Date	Reviewer	# of Days	Findings	Publication Date	Review Date	Reviewer	# of Days	Findings
Medicare Opt-Out	https://www.CMS.gov	QTRLY				0					0					0	
Medicare/ Medicaid Sanctions	OIG	MO				0					0					0	
Medi-Cal Suspended/Ineligible Provider	Medi-Cal	MO				0					0					0	
DHCS Restricted Provider List	DHCS RPD	Secure Access YH															
SAM (System for Award management) formerly EPLS	https://www.SAM.gov - Individuals & organizations debarred from participating in government contracts	MO				0					0					0	

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Ongoing Monitoring Auditor Review List
Kern Health Systems

Licensing Board	Degree/Board	Frequency	Jul						Aug						Sep					
			Publication Date	Review Date	Reviewer	Compliant	Findings	Publication Date	Review Date	Reviewer	# of Days	Findings	Publication Date	Review Date	Reviewer	# of Days	Findings			
CA Board of Chiropractic Examiners	DC	MO				Publication Date			*			Publication Date			*			Publication Date		
Dental Board of California	DDS	MO	*			Publication Date			*			Publication Date			*			Publication Date		
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Board of Podiatric Medicine *	DPM	MO										0						0		
Medical Board of CA	MD	E-mail subscription, Monthly e-mails										0						0		
Acupuncture Board *	LAC, AC	MO										0						0		
CA Board of Optometry *	OD	QTRLY										0						0		
Board of Occupational Therapy	OT, OTA	MO	*			Publication Date			*			Publication Date			*			Publication Date		
Physician Assistant Committee	PA, PAC	MO				Publication Date			*			Publication Date			*			Publication Date		
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Speech-Language Pathology & Audiology Board	SP, AU	QTRLY	*			Publication Date			*			Publication Date			*			Publication Date		
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Organization/Agency	Report	Frequency	Jul						Aug						Sep					
			Publication Date	Review Date	Reviewer	Compliant	Findings	Publication Date	Review Date	Reviewer	# of Days	Findings	Publication Date	Review Date	Reviewer	# of Days	Findings			
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Medicare/ Medicaid Sanctions	OIG	MO																0		
Medi-Cal Suspended/Ineligible Provider	Medi-Cal	MO																0		
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Kern Health Systems

Licensing Board	Degree/Board	Frequency	Oct						Nov						Dec					
			Publication Date	Review Date	Reviewer	Compliant	Findings	Publication Date	Review Date	Reviewer	# of Days	Findings	Publication Date	Review Date	Reviewer	# of Days	Findings			
CA Board of Chiropractic Examiners	DC	MO	*			Publication Date		*			Publication Date		*			Publication Date				
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Acupuncture Board *	LAC, AC	MO				0					0					0				
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