

 <b>WRAPAROUND MILWAUKEE POLICY &amp; PROCEDURE</b>	Date Issued:  <b>11/15/07</b>	Reviewed: <b>9/29/14</b> By: <b>WA</b> Last Revision: <b>9/29/14</b>	Section:  <b>PROVIDER NETWORK</b>	Policy No:  <b>002</b>	Pages:  <b>1 of 2</b>
<input checked="" type="checkbox"/> <b>Wraparound</b> <input checked="" type="checkbox"/> <b>Wraparound-REACH</b> <input checked="" type="checkbox"/> <b>FISS</b> <input checked="" type="checkbox"/> <b>Project O-Yeah</b>	Effective Date:  <b>1/1/15</b>	Subject:  <b>MONITORING OF PRACTITIONER SANCTIONS AND COMPLAINTS</b>			

## POLICY

It is the policy of Wraparound Milwaukee to maintain ongoing monitoring of practitioners credentialed by Wraparound Milwaukee between credentialing cycles.

## II. PROCEDURE

The following process will be utilized for ongoing monitoring of practitioner sanctions, licensing restrictions or limitations on scope of practice and complaints that may be filed against practitioners that have been credentialed by Wraparound Milwaukee.

### Medicare and Medicaid Sanctions

Between credentialing cycles, the Wraparound Milwaukee Quality Assurance Specialist or other designee will review Medicare and Medicaid exclusion reports. The reports available through the United States Department of Health and Human Services Office of Inspector General (OIG) website at <http://oig.hhs.gov/> are reviewed on a monthly basis for findings associated with practitioners that have been credentialed by Wraparound Milwaukee. Findings relevant to Wraparound Milwaukee Provider Network practitioners will be reported to the Credentialing Committee for review and recommendations at the next scheduled meeting. A record of the OIG report review is maintained by the Quality Assurance Specialist or other designee.

### Wisconsin State Licensing Board Sanctions

Between credentialing cycles, State of Wisconsin Department of Regulation and Licensing Discipline/Orders will be monitored by the Wraparound Milwaukee Quality Assurance Specialist or other designee on a monthly basis. The reports that are available through the Department of Regulation and Licensing website at <http://drl.wi.gov/dept/decisions/main.htm> will be reviewed for licensing/certification sanctions or limitations associated with practitioners that have been credentialed by Wraparound Milwaukee. If a report contains findings associated with a practitioner credentialed by Wraparound Milwaukee, the practitioner will be required to submit a written explanation of the situation resulting in the sanction/limitation. The practitioner explanation will be forwarded, along with a copy of the State Licensing Report, for immediate review by the Medical Director and will be included on the agenda for the next scheduled Credentialing Committee Meeting. The Credentialing Committee will prepare recommendations regarding the adverse practitioner related information. A record of the Regulation and Licensing report review is maintained by the Quality Assurance Specialist or other designee.

### Other Adverse Events, Quality or Discrimination Complaints

It is the policy of Wraparound Milwaukee that complaints are processed by the Quality Assurance Department. Complaints involving practitioners that have been credentialed by Wraparound Milwaukee will be forwarded by the Quality Assurance Director to the Provider Network Coordinator, Provider Network Quality Assurance Specialist and/or Medical Director for review. In keeping with Milwaukee County requirements, Wraparound Milwaukee policies, the Wraparound Milwaukee Fee-for-Service Agreement in effect at the time of the complaint and the severity of the complaint, the Wraparound Milwaukee Quality Assurance Department, in conjunction with Wraparound Milwaukee Administration, will take immediate action as deemed appropriate to the severity of the complaint. For complaints perceived to be minor (process related), the practitioner may be allowed to maintain active status throughout the complaint review process. If the complaint is serious in nature or endangers the safety of participants, service recipients or another provider, Wraparound Milwaukee may institute sanctions against the practitioner during the

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**Monitoring of Practitioner Sanctions & Complaints Policy**

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complaint review process. All complaints will be managed by the Wraparound Milwaukee Complaint Review Process, which includes a formal investigation, review of the complaint with the practitioner and written report regarding the complaint review and outcome.

Substantiated complaints will be documented in the practitioner's credentialing file and forwarded to the Credentialing Committee for review and recommendation.

Wraparound Milwaukee Administration shall have the final decision on corrective action or sanctions to be implemented as a result of a substantiated complaint. The Medical Director will assist with written communication to the practitioner when sanctions involve a Physician.

**Notice of Change in Practitioner Status to Contracted Plans**

The United States Department of Health and Human Services Office of Inspector General (OIG) findings, Department of Regulations and Licensing sanctions/limitations and Wraparound Milwaukee Quality Management sanctions associated with Wraparound Milwaukee credentialed practitioners will be reported promptly by the Provider Network Coordinator or Quality Assurance Specialist to Health Plans or Managed Care Entities that contract with Wraparound Milwaukee for mental health and AODA (alcohol and other drug abuse) practitioner credentialing.

**Reviewed & Approved By:** \_\_\_\_\_



**Bruce Kamradt, Director**