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MILWAUKEE COUNTY
**DEPARTMENT OF
HEALTH & HUMAN
SERVICES**

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Owner Theresa Randall:
Program Manager –
Provider Relations
Policy Area Provider Network
- Impaneling

Impaneling Policy

Purpose:

It is the intent of Milwaukee County Behavioral Health Services (MCBHS) to impanel any individual who will provide services directly or indirectly to clients of MCBHS.

Scope:

It is the responsibility of MCBHS to ensure the appropriate DSPs are available through the Provider Network to assist in meeting the needs of MCBHS clients. This is accomplished through an effective add request and impaneling process. MCBHS is not responsible for dictating employment decisions, but designates whether individuals are eligible to serve as DSP/ISs for MCBHS clients.

Policy:

This policy will provide guidance and consistency for MCBHS in determining eligibility for individuals within the respective MCBHS Provider Networks. All agency requests for individuals to provide services through the MCBHS Provider Networks are subject to the Impaneling Review with respect to caregiver background checks, training, education, and licensing requirements (including driver's license and professional license) set forth by county, state and/or federal licensing/regulatory agencies. This policy is not applicable to licensed Physicians, Physician Assistants, Psychologists or Advanced Practice Nurse Prescribers (For these credentials, refer to the Provider Network Credentialing Program for specifics).

MCBHS encourages enrollment of a broad range of individuals in order to promote client choice and diversity within the MCBHS Provider Networks.

The impaneling process shall not discriminate against any individual: On the basis of race, religion, color, national origin or ancestry, age, sex, sexual orientation, gender identity and gender expression, disability, marital status, family status, lawful source of income, military/veteran status or military participation, or status as a victim of domestic abuse, sexual assault or stalking, handicap, physical condition, developmental disability or arrest or conviction record except when such a record or condition is substantially related to job duties and ability to care for clients with reasonable skill and safety.

Definitions:

Impaneling – Determination of eligibility for individuals applying to become a part of the MCBHS Provider Network(s). Impaneling consists of a review of required documentation set forth by county, state and/or federal licensing and regulatory agencies.

Impaneling Committee – MCBHS designated staff members who are responsible for reviewing add requests of individuals with adverse activity/flagged item(s) and/or quality of care issue(s).

Direct Service Provider (DSP) - Provider employee, volunteer, paid or unpaid intern, or Independent Service Provider, who provides direct care and/or Covered Services to a Client/Participant/Service Recipient on behalf of a Provider, for which the Provider receives compensation from the Purchaser under MCBHS Agreement.

Indirect Staff (IS) - Provider employee or individual independent contractor who is not a DSP, but is associated with Covered Services as a supervisor, billing staff, case records and/or quality assurance worker, and/or is someone (i.e.: volunteer) who has access to clients, client property, and/or client information of Service Recipients. Agency owner, President, CEO, Executive Director, and/or Senior Staff are considered Indirect Staff if reporting to work at a site where Covered Services are provided.

Provider/Contractor/Vendor/Agency - Entity or individual with whom this Agreement has been executed. Provider and Contractor/Vendor/Agency have been used interchangeably throughout this document both refer entity or individual with whom this Agreement has been executed.

Procedure:

Provider Agencies must adhere to add/drop and provider responsibilities policies and procedure for respective Provider Network(s). See attached Impaneling Checklist (Attachment #1) for reference.

Confidentiality: DSP/ISs information related to the add request with the respective network at MCBHS will be kept confidential and in a secure location either electronically and/or in a locked file cabinet.

A. **Impaneling Committee:**

The Impaneling Committee(s) of the respective networks must consist of at least three (3) or more MCBHS staff that are involved in the following areas: Quality Assurance, Contract Administration, or other areas deemed necessary by MCBHS. The committee members are asked to make a one year commitment to the committee. No committee member is able to serve on more than one MCBHS Impaneling Committee at one time. The committee will meet on an as need basis. One (1) individual from the committee must be designated Chair of the

committee. The Chair must maintain a MCBHS leadership position with decision making authority. Only committee members will have voting privileges on the Committee.

B. Impaneling Decision Process:

Final decision making for impaneling of individuals rests with MCBHS. Impaneling decision process includes the following types of scenarios and workflows:

1. Workflow: All documents for the potential individual have been received and are complete

Outcome & Action: Individual is eligible within the Network
MCBHS will notify the Provider Agency of the eligibility outcome

2. Workflow: All documents for the potential individual have been received, but are incomplete

Outcome & Action: MCBHS will notify Provider Agency of the request for the completion and resubmission of the documents

3. Workflow: All documents for the potential individual have been received & are complete
Potential individual does not meet requirements for the specified Service Code/Description

Outcome & Action: Ineligible within the Network
MCBHS will notify the Provider Agency of the eligibility outcome

Examples of reasons why potential individual does not meet requirements for the specified Service Code/Description:

- Degree
- Licensure
- Experience or training
- Invalid driver's license (applicable if program requires driver's license)

4. Workflow: All documents for the potential individual have been received & are complete

All required steps to be completed by MCBHS are verified
MCBHS identified an item of concern/flagged item
Refer to Impaneling Committee Chair for decision

Outcome & Action: Impaneling Chair determines eligibility outcome
MCBHS will notify the Provider Agency of the eligibility outcome

5. Workflow: All documents for the potential individual have been received & are complete

All required steps to be completed by MCBHS are verified
MCBHS identified an item of concern/flagged item Refer to Impaneling Committee

Chair for decision
Impaneling Committee Chair referred decision to Impaneling Committee for review
Refer to Impaneling Committee for decision

Outcome & Action: Impaneling Committee determines eligibility outcome
MCBHS will notify the Provider Agency of the eligibility outcome

Impaneling staff will take the following into consideration when determining whether an add request must be sent to the Impaneling Committee Chair for review:

- Driver's Abstract history/record
- WI Caregiver Law findings
- Findings per Milwaukee County Resolution #20-287
- Licensing/Education/Experience concerns
- Criminal History concerns
- Restrictions/Exclusions per county, state or other applicable authorities
- History of performance concerns/findings within Provider Network(s)

Attachments

[Impaneling Process Checklist.pdf](#)

Approval Signatures

Step Description	Approver	Date
	Michael Lappen: BHD Administrator	12/15/2022
	John Schneider: Executive Medical Director	12/15/2022
	Shane Moasio: BH Med Dir - Acute Services	10/19/2022
	Amy Lorenz: Deputy Administrator, Community	10/11/2022
	Brian McBride: ExDir2 – Program Administrator	10/11/2022
	Brenda SmithJenkins: Manager-Contracts and Network Services [LW]	10/11/2022

Lolita Williams: Contract
Compliance Auditor

3/29/2022

Theresa Randall: Program
Manager – Provider Relations

3/28/2022

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