



Clarification: Credentialing and Disenrollment Procedures

Topic: Personnel Standards

Audience: SPOE, Service Coordinators, Provider Agencies, and Providers

Date: 05/10/2023

General Information

The purpose of this clarification is to establish clear procedures regarding credentialing expectations and consequences when required credentialing activities are not completed. The procedures described below will be effective June 1, 2024.

- The [First Steps Policy Manual](#) states:
 - First Steps uses a credentialing process to certify that individuals providing early intervention services are qualified and possess the competencies needed to work effectively with infants, toddlers and their families.
 - Failure to complete all of the required credential activities within the specified enrollment period will result in the provider's dis-enrollment from the First Steps program.
- The [Agency/Independent Provider Agreement](#), [Provider Agreement](#), and [Service Coordinator Agreement](#) make clear that maintenance of credentialing is required and specify that services will not be reimbursed should credentialing activities not be completed.
- The Provider Enrollment Management team sends a courtesy reminder notice of upcoming credentialing due dates to the Point of Contact¹ on file for provider agencies and SPOEs as well as to the individual provider/service coordinator. This reminder is sent at the beginning of each month and contains a list of individuals due to credential in the next two following months (e.g. a list sent at the beginning of January would list those due to credential in February and March).
- This notice is a courtesy reminder, and it remains the responsibility of Agencies, SPOEs, Service Providers, and Service Coordinators to ensure that annual credentialing activities

¹ Please review your Point of Contact information for accuracy and update the information whenever changes occur.

First Steps State Administration

Bureau of Child Development Services
Division of Disability and Rehabilitative Services
Indiana Family and Social Services Administration

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W453, MS-51
Indianapolis, IN 46204-2739

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FAX: 317-234-6701
FirstStepsWeb@fssa.in.gov

are completed by the credentialing due date in order for First Steps to maintain quality personnel and avoid disenrollment.

Extension Requests

In the event that an individual may not be able to complete the credentialing process prior to their credentialing due date due to exceptional circumstances, a request for an extension may be submitted. The following considerations and procedures apply:

- Extensions will *only* be considered for First Steps professional development requirements. All other credentialing requirements *must* be completed and submitted prior to or on the credential due date.
 - Credentialing forms can be found [here](#) and include the full list of requirements and necessary documentation
- The [Credentialing Extension Request Form](#) must be completed and submitted to the First Steps Web (FirstStepsWeb@fssa.in.gov) no less than two weeks prior to the credentialing due date.
 - Approval of an extension request is not guaranteed and is granted at the discretion of the State. Previous extension requests will be reviewed as part of the State's decision-making process.
 - The State will review requests and issue a response within 3 business days. Individuals should continue to operate under the presumption that the credentialing due date remains unchanged unless and until granted an extension.
- If granted an extension, the extension shall be for no more than 30 days.
 - Upon completion of additional professional development, please complete and submit an updated [Annual Credential Form](#) along with supporting documentation to ineihubenroll@pcgus.com.

Disenrollment

In the event that an individual does not complete all required credentialing activities by the credentialing due date or extension deadline (if approved), the following disenrollment procedures will be followed:

- On the 15th of each month, all individuals with outstanding credentialing requirements who had a credentialing due date or extension deadline in the preceding month will be disenrolled if all credentialing requirements have not been completed.

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- The Provider Enrollment Management team will send Disenrollment Notice to the Point of Contact and the individual who has been disenrolled.
- Upon disenrollment, a provider, independent provider, or service coordinator is no longer permitted to provide or bill for services until once again in good standing with all credentialing requirements.
 - Under these circumstances, provider agencies and SPOEs will be responsible for ensuring that a currently enrolled and credentialed provider or service coordinator is identified to continue services without interruption. Families must be notified of any changes in service provision.
- Provider access to EI Hub modules will be removed upon disenrollment. Providers may desire to access the EI Hub learning management system following disenrollment in order to work toward completing professional development activities. Requests for continued access must be emailed to FirstStepsWeb@fssa.in.gov.

Re-instatement

In the event that an individual has been disenrolled and wishes to have their enrollment re-instated, the following procedures apply:

- Procedures for those disenrolled due to incomplete credentialing
 - Disenrolled providers who have not completed all credentialing requirements may be reinstated upon satisfactory completion of all outstanding credentialing requirements within twelve months from the date of disenrollment.
 - The provider's credentialing date ***will not*** change under these circumstances.
 - Disenrolled providers with outstanding credentialing requirements who do not re-credential within 12 months of disenrollment must complete the following in order to re-enroll:
 - Complete all outstanding credentialing requirements
 - Complete the initial credentialing activities outlined in the Policy Manual
- Procedures for those who have voluntarily disenrolled²

² Voluntary disenrollment may not be used to avoid annual credentialing requirements, and BCDS reserves the right to exercise discretion in determining if that has occurred.

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- Disenrolled providers, whose credentialing was in good standing at the time of disenrollment, are exempt from the following requirements if re-enrolling within five years from the date of disenrollment:
 - Initial credential trainings
 - First year supervision requirements for Developmental Therapists
- Re-enrolling providers who voluntarily disenrolled will receive a new credentialing date based on the date of re-enrollment.

Timelines

Action	Timeframe
Reminder Notice Issued	At the beginning of each month
Request for Credentialing Extension	At least two weeks prior to credentialing due date
State Responds to Extension Request	Within 3 business days of request
Credentialing Materials Due	By individual Credentialing Date
Disenrollment (if no extension is requested and approved)	15 th day of the month following the Credentialing Date
Credentialing Materials Due (if an extension was requested and approved)	No more than 30 days from credentialing date
Disenrollment (if extension deadline is missed)	15 th day of the month following the extension due date

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