

Friday, March 30, 2018

The National Association of Social Workers North Carolina Chapter (NASW-NC) is a membership organization that promotes, develops, and protects the practice of social work and social workers. NASW-NC also seeks to enhance the effective functioning and well-being of individuals, families and communities through its work and advocacy.

Thank you for the opportunity to provide feedback on the Concept Paper, *Centralized Credentialing and Provider Enrollment* published March 20, 2018.

Page 5: Thank you for requiring a centralized process for enrollment. Providers have been upset about differences in credentialing with different LME/MCOs. This is an incentive to participate.

Regarding contracts and credentialing, we request that simple contracts be used for private practice providers and those in small agencies. They should not be required to do the same type of contract as a hospital or large agency. We have found that many providers have issues with the standard contracts as the stipulations do not apply to them (i.e. level of insurance required, requirements for facilities, etc). Additionally, we request that providers be notified of their acceptance as quickly as possible.

The Professional Association Council (PAC), a behavioral health coalition group held monthly sat down with LME/MCO attorneys about five years ago and developed a contract for small providers. Despite the work, this contract is only suggested for use and not required.

Page 7: Length of time to accept a new provider into the network: 75 days is too much time when you're hiring a provider in your company especially to fill a critical service need. We highly recommend this time be cut down from application to acceptance "within 60 days." However, some providers have experienced longer than 75 days so if 75 days can be guaranteed, many providers would appreciate that solid timeframe.

#### Other

We request that all provider types be accepted under Medicaid for direct enrollment. This includes Associate level licenses such as the Licensed Clinical Social Work Associate (LCSWA).

There is a great need for behavioral health practitioners to become Medicaid providers in North Carolina. We request for behavioral health providers, particularly those in private practice, be removed from the High-Risk Category. This category creates extra hurdles for practitioners to join as Medicaid providers.

Sincerely,

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