

August 17, 2023

RULING LETTER NO. CN-2023-339-D

TO ALL HEALTH INSURANCE ORGANIZATIONS OR INSURERS THAT WRITE PRIVATE HEALTH INSURANCE IN PUERTO RICO.

IMPLEMENTATION OF THE UNIFORM APPLICATION FORM AND GATHERING NECESSARY DATA IN THE PROCESS OF VERIFICATION OF CREDENTIALS OF HEALTH SERVICES PROVIDERS AND THE IMPLEMENTATION OF THE OCI DIGITAL CREDENTIALING PLATFORM.

To Whom It May Concern:

Act 73-2023 establishes a centralized process for the verification of credentials of health services providers in Puerto Rico. This act amended Chapter 18 of the Puerto Rico Health Insurance Code, *Verification of Credentials of Health Professionals or Entities*, in which Sections 18.040 and 18.051 require health insurance organizations and insurers that offer private health insurance to use a compulsory Uniform Application Form for Credentialing and Re-Credentialing, following the parameters adopted by the Secretary of the Department of Health in coordination with the Office of the Commissioner of Insurance.

In compliance with the provisions of Section 18.051 of the Puerto Rico Health Insurance Code, this Office developed a digital platform for the implementation of a centralized electronic system for the verification of credentials in the private health insurance sector. This Ruling Letter is issued for the purpose of establishing the guidelines that will allow for an orderly implementation in full compliance with the new provisions for the credentialing process established in the Puerto Rico Health Insurance Code.¹

I. Uniform Application Form for Credentialing and Re-credentialing:

- a. The Uniform Application Form, in electronic format, must be used for the credentialing and re-credentialing processes by insurers and health insurance organizations that are authorized by this Office to write private health insurance.

¹ Section 8, Act 73-2023 – Implementation of the Credentialing Process in Phases: To achieve an effective implementation of this Act, it is established that the implementation processes will be in phases. For the first phase, it is established that the credentialing process under this Act will be used only for healthcare professionals. For the second phase, it is established that the credentialing process under this Act will include healthcare institutions and health services providers.

- b. The use of the Uniform Application Form will be mandatory for the credentialing and re-credentialing processes of natural or legal persons that seek to enter into contracts with an insurer, a health insurance organization, or a health services organization to become a health services provider under the coverage of private health insurance in Puerto Rico.
- c. As provided in Section 18.051(c) of the Health Insurance Code Puerto Rico, no insurer or health insurance organization or health services organization or any of its intermediaries may require that a health professional or healthcare facility that is applying to submit additional information or information other than that which is required in the Uniform Application Form established under that section, except that the applicant will continue to submit the endorsements of medical or hospital care that may be required by the insurer or HMO independently.

II. Centralized Verification Process of Credentials of Health Services Providers – Implementation and Use of the Digital Credentialing Platform of the Office of the Commissioner of Insurance:

Act 73-2023 requires the Secretary of the Department of Health, in coordination with the Office of the Commissioner of Insurance, to develop a digital platform that will allow for the implementation of a centralized electronic system for the verification of credentials of natural or legal persons that are seeking to enter into contracts with any insurer to be a health services provider. Section 18.051, introduced into the Puerto Rico Health Insurance Code through Act 73-2023, vests the Commissioner with the power to require the use of the Uniform Application Form in the credentialing and re-credentialing processes of insurers or health insurance organizations, following the parameters adopted by the Secretary of the Department of Health, and using the parameters established in Section 7 for the Administration of Health Insurance of Puerto Rico introduced in Act 73-2023.

The digital platform developed by the Office of the Commissioner of Insurance for the implementation of a centralized electronic system for the verification of credentials (“*OCI Digital Credentialing Platform*”), will facilitate the electronic submission of the information required in the Uniform Application Form by the health services providers that seek to enter into contracts with insurers or health insurance organizations that provide private health insurance and will gather in a single place the information and the documents related to the providers’ credentials. This will also facilitate access by insurers and health services organizations to this information to streamline the verification process of the credentials prior to contracting the interested provider. The implementation and use of the *OCI Digital Credentialing Platform* will be as follows:

- a. Healthcare professionals that work with private health insurance will be included in the first phase of the implementation of the Centralized Process for the Verification of Credentials of Health Services Providers of the OCI (“Phase I”), as provided in Section 8 of Act 73-023.

- b. The Office of the Commissioner of Insurance of Puerto Rico (OCI) will provide access to the *OCI Digital Credentialing Platform* at: credencializacion.oci.pr.gov.
- c. All health services providers must complete their registration on the *OCI Digital Credentialing Platform*, as a first step in their credentialing process with insurers or health insurance organizations of private health insurance with which they are renewing their contracts or applying for contracts, or if they are new providers, applying for a contract.
- d. Health services providers (“Individual Health Care Provider or Incorporated Individual”) must first complete their registration on the *OCI Digital Credentialing Platform* and then proceed to complete the Electronic Credentialing Uniform Application for Individual Providers or Incorporated Individual Providers (“Uniform Application”) of the *OCI Digital Credentialing Platform*.
- e. Individual Health Care Providers or Incorporated Individuals must complete each one of the mandatory fields of the Uniform Application and validate all of the information that is submitted and/or updated.
- f. The *OCI Digital Credentialing Platform* will provide the health services provider with the alternative of indicating a designee who on behalf of the provider may effect the credentialing process once the provider’s profile has been created and completing the first attestation or oath stating that such person has been designated to complete the credentialing process.
- g. The health services provider or the designee may enter all of the required information and documentation to complete the credentialing or re-credentialing process in the *OCI Digital Credentialing Platform*.
- h. All of the information and documentation of the credentials entered by the registered health services provider or designee thereof in the *OCI Digital Credentialing Platform* will be held there until the process is completed, a second review has been performed to validate the information and the documents, and the required attestation or oath has been completed. Until such time as the health services provider or the authorized designee of such for the platform has completed the Uniform Application Form and entered the documentation of the credentials in the appropriate fields as well as the required oath, the insurer or health insurance organization will not have access to the record.
- i. Once the completed Uniform Application Form has been submitted through the *OCI Digital Credentialing Platform*, a notification will be emailed to the insurer or health insurance organization confirming that the provider’s application was submitted.

- j. As provided in Section 18.052(b) of the Puerto Rico Health Insurance Code, it is the obligation of the insurer or health insurance organization to notify any deficiency to the professional or healthcare institution that is the applicant, in the event that it is deemed that the application has not been submitted correctly and completely, **specifying the defects that were found in the application** so that the application may be processed within fifteen (15) days to be counted from the date of receipt of the provider's application for credentialing. The healthcare professional or institution will be entitled to supplement or correct the application or request reconsideration to contest any objection within no more than thirty (30) days to be counted from the notification to the applicant of the defect.
- k. Once the application has been received with the appropriate corrections of the objections or comments made by the insurer or health insurance organization or health services organization, there will be a term of no more than thirty (30) days in which to corroborate the application and the documents that were submitted, and the healthcare professional or institution that submitted the application must be notified within that term of the decision regarding the credentialing or re-credentialing application.
- l. Once the credentials are verified, the insurer or health insurance organization shall mark the case as "COMPLETED" within the *OCI Digital Credentialing Platform*.
- m. The insurer, health insurance organization, or health services organization must confirm in the platform the action that it is taking with regard to the credentialing and re-credentialing application since otherwise the application task cannot be closed.
- n. As provided in Section 18.052(d) of the Puerto Rico Health Insurance Code, once thirty (30) days have elapsed from the date on which the application was received without any objection being made to the application, the accreditation or re-accreditation of the professional or health care institution will be deemed to be approved.
- o. To gain access a the *OCI Digital Credentialing Platform*, insurers or health insurance organizations must register in the digital platform and create an account. The insurers or health insurance organizations will determine the personnel that will be assigned to the platform. It will be the responsibility of the insurer, the health insurance organization, or the health services organization to identify the persons who will be designated and be responsible for the work the entity performs on the platform and maintain control of access to the platform.

- p. Through the *OCI Digital Credentialing Platform* this Office will audit the time employed by the insurer or health insurance organization to complete credentialing cycles from the time the insurer or health insurance organization has access to the health services provider's record on the platform, as provided in Section 18.052 of the Puerto Rico Health Insurance Code.

III. Term for the Verification of Credentials:

As provided in Section 18.052 of the Puerto Rico Health Insurance Code:

- a. All insurers, health insurance organizations, or health services organizations must complete the verification process for credentialing or re-credentialing of the healthcare professional or institution applicant within thirty (30) days of receiving the duly completed Uniform Application Form in all of its parts and including the required information and documents.
- b. Within fifteen (15) days of the receipt of the application, the insurer or the health insurance organization will notify the healthcare professional or institution of any defect, if it is considered that the application has not been submitted correctly and completely; specifying the defects that were found in the application so that it may be processed. The healthcare professional or institution will be entitled to supplement or correct the application or to request reconsideration to contest any objection within no more than thirty (30) days to be counted from the notification to the applicant of the defect.
- c. Once the application is received with the appropriate corrections of the objections made by the insurer or health insurance organization, the insurer or the health insurance organization will have no more than thirty (30) days in which to corroborate the application and the documents that were submitted and will notify the healthcare professional or institution within that term of the decision on the credentialing or re-credentialing application.
- d. When thirty (30) days have elapsed from the date of receipt of the application without any objection being raised, the accreditation or re-accreditation of the healthcare professional or institution will be deemed to have been approved.

IV. Validation of Credentials:

As provided in Section 18.053 of the Puerto Rico Health Insurance Code, it will not be necessary for professionals or entities that have been duly credentialed by the central credential review committee of the Department of Health to resubmit to the credentialing or re-credentialing process of an insurer, health insurance organization, or health services organization that write

health insurance in the private sector, while such certification of credentials is in effect, so that the verification of the credentials of a provider under the Medicaid program, Medicare, or Medicare Advantage that has been successfully completed by an insurer or health insurance organization, will be accepted for the purpose of meeting the credentialing and re-credentialing requirements in the private health insurance sector.

V. Cost of Access to the OCI Digital Credentialing Platform:

As provided in Section 7.010(2)(m) of the Puerto Rico Insurance Code, the Commissioner may collect in advance the following annual charge for the service and maintenance required by the Centralized Electronic System for the Verification of Credentials and the Uniform Application Form as may be determined by the Commissioner:

- a. Health insurance organizations or insurers with 5,000 or fewer participating health services providers will pay an annual amount of \$5,500.
- b. Health insurance organizations or insurers with more than 5,000 participating health services providers will pay an annual amount of \$7,500.

This fee will be used for the maintenance of the *OCI Digital Credentialing Platform*, optimization of the platform, data storage, documents, and transmission, as well as for the primary purpose of continually developing the functionality and interoperability of the system as part of the implementation of the Centralized Verification of Credentials Process for Health Services Providers as provided in Act 73-2023.

It should be noted that the use of the *OCI Digital Credentialing Platform* by health services providers in Puerto Rico will be free of charge for individual healthcare professionals and incorporated individuals in Phase I and eventually for health services providers and healthcare institutions in Phase II.

VI. Access to the OCI Digital Credentialing Platform Register:

All insurers, health insurance organizations, and health services organizations must integrate the *OCI Digital Credentialing Platform* link into their web pages in the appropriate area so that health services providers may be redirected to our web-based credentialing platform.

Insurers, health insurance organizations, and health services organizations must also create an email account for healthcare professionals included in Phase I in the format credencialesmedicos@yourdomain.com. The purpose of that email address is to be the only communication channel between the *OCI Digital Credentialing Platform* and the insurers, health insurance organizations, and health services organizations.

Strict compliance with this Ruling Letter is hereby required of all entities. If any healthcare provider considers that there has been any action contrary to the provisions of Act 73-2023, the provider may submit a request for investigation to the OCI by writing to the Office or by email at investigaciones@oci.pr.gov.

Cordially,

SIGNED

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Commissioner of Insurance of Puerto Rico