



**Michelle Lujan Grisham, Governor**  
Kari Armijo, Secretary  
Alex Castillo Smith, Deputy Secretary  
Kathy Slater Huff, Deputy Secretary  
Kyra Ochoa, Deputy Secretary  
Dana Flannery, Medicaid Director

**Date: April 21, 2025**

**To: Nancy Smith-Leslie, Blue Cross Blue Shield**

**From: Jennifer Jones, Deputy Bureau Chief, Managed Care Oversight Bureau**

**CC: Dana Flannery, Medical Assistance Division (MAD) Director, Michal Hayes, MAD Deputy Director, and Charles Canada, Acting Compliance Unit Bureau Chief**

**RE: Notice of Concern: Credentialing and Care Coordination**

The New Mexico Health Care Authority/Managed Care Oversight Bureau (HCA/MCOB) is writing to Blue Cross Blue Shield (BCBS) to express concerns regarding the implementation of credentialing and care coordination requirements, pursuant to the following sections of the Turquoise Care Medicaid Managed Care Services Agreement (MSA) PSC 24-630-8000-0029, A1 and Turquoise Care Policy Manual (PM):

- MSA - 4.8.16 Standards for Credentialing and Recredentialing
- PM - 4.15.2 Care Coordination Presence in Hospitals

You must work cooperatively with HCA to address and resolve HCA's concerns pursuant to MSA Sections 1.7 and 7.32.

**A. Standards for Credentialing and Recredentialing**

MSA Section 4.8.16.4 requires BCBS to work with all other managed care organizations (MCOs) to contract with a single, centralized and National Committee for Quality Assurance approved Credential Verification Organization to process credentialing applications and perform primary source verifications. To align with 4.8.16.5, HCA provided a directive on May 24, 2024 to all MCOs to form a work group to develop a unified credentialing solution and implementation plan for HCA review. HCA held meetings with all four MCOs to assess progress on December 10, 2024, and January 23, 2025. The unified plan submitted by MCOs on February 5, 2025 did not align with contract requirements nor HCA expectations. Specifically, the MCO-proposed credentialing solution requires a provider to interface with each of the MCOs individually to complete the credentialing process, rather than through a centralized credentialing single vendor. This causes unnecessary provider burden, delays in access to services, and does not align with the requirements delineated in MSA Section 4.8.16.5.

BCBS must remedy the above cited issues and implement a unified credentialing solution by no later than October 1, 2025. In addition, BCBS must coordinate with United Health Care (UHC), Molina Health



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Care (MHC) and Presbyterian Health Plan (PHP), to submit one unified plan to HCA that addresses, at minimum, the following:

1. A unified credentialing and recredentialing solution that addresses MSA 4.8.16.5.2, offering a single portal that allows providers to submit single applications and upload all required documentation one-time for the credentialing/recredentialing process.
2. Development of a procedure to ensure there is a unified communication to providers for any outstanding items at initial credentialing and recredentialing for any of the MCOs, including but not limited to:
  - a. Use of a single, standardized credentialing form developed by the credentialing/recredentialing committee or other peer review body.
  - b. Collaboration with the other MCOs to develop standard forms, processes, and solutions used for credentialing/recredentialing.
3. A detailed implementation schedule to align with the go-live date of October 1, 2025.
  - a. Ensure the inclusion of mitigation plans to ensure all providers receive timely assistance through the transition to the unified credentialing/recredentialing process.
  - b. Assurances to HCA for issues that may derail the implementation timeline will be escalated to HCA within one business day of notification.
4. Designate a credentialing/recredentialing committee or other peer review body to make recommendations and decisions regarding credentialing issues including but not limited to:
  - a. Implementation of the Plan, Do, Study, Act model to any procedures to identify points of failure or areas for improvement.
  - b. A mitigation plan to ensure points of failure or bottlenecks are resolved timely and providers are not burdened with additional tasks.
5. Align recredentialing timelines among all MCOs and provide a centralized contact procedure for recredentialing.
6. A communication plan to ensure existing and prospective providers and other stakeholders are aware of the MCO centralized credentialing process.

The plan must be submitted via email to [HCA-MCodeliverables@hca.nm.gov](mailto:HCA-MCodeliverables@hca.nm.gov) by May 5, 2025.

#### **B. Comprehensive Addiction Recovery Act (CARA) Care Coordination**

The Turquoise Care Managed Care PM 4.15.2, Care Coordination Presence in Hospitals, requires BCBS to have a care coordination presence in specific hospitals. In the BCBS deliverable provided to the HCA Quality Bureau deliverable on April 3, 2025, it does not appear BCBS has a presence in all five hospitals as outlined in the PM:

- a. *University of New Mexico Children's Hospital Level IV*



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- b. Lovelace Women's Hospital Level III*
- c. Presbyterian Main Hospital Level III*
- d. Memorial Medical Center Level II*
- e. Mountain View Medical Center Level II*

In order to resolve this Notice of Concern, BCBS must remedy the above cited issues by no later than 90 days from the date of this notice and provide a detailed plan that addresses, at minimum, the following:

1. How BCBS will ensure care coordination presence in all five hospitals within 90 days.
2. How BCBS will ensure daily engagement with the CARA population in the five hospital locations within 90 days.
3. How BCBS is monitoring daily attendance at each of the five hospital locations.
  - a. Provide example(s) of the attendance sheet or tracking mechanisms BCBS is using to monitor daily attendance.

The plan must be submitted via email to [HCA-MCOTDeliverables@hca.nm.gov](mailto:HCA-MCOTDeliverables@hca.nm.gov) by May 5, 2025.

Failure to demonstrate compliance with requirements outlined in this Notice of Concern may result in additional compliance action pursuant to MSA 7.3, up to and including sanctions.

If you have any questions, please contact your MCO contract manager.

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MCOB Deputy Bureau Chief  
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