So, You Want to Become an NCQA-certified CVO: The Tools and Tips to Get You There

Session Code: WE08

Date: Wednesday, September 21, 2016

Time: 10:30am - 12:00pm

Total CE Credits: 1.5

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So you want to be an NCQA-certified CVO: The tips and tools to get you there

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Objectives

• Summarize the types of CVOs and services
• Describe the challenges and benefits of CVO certification
• Outline NCQA CVO certification requirements
• Identify methods to achieve an NCQA-compliant CVO process

What is a CVO?

Per NCQA, a CVO is “an organization that conducts primary-source verification of practitioner credentials for other organizations.”
What is a CVO?

- CVOs are entities that perform a set of credentialing activities on behalf of clients pursuant to an agreement
  - External or commercial, for profit
  - Internal, nonprofit
  - Combination
- Terminology varies by organization
  - Credentialing Verification Organization
  - Credentials Verification Service
  - Centralized Credentialing Department or Service

CVO services

- Application management
- Data collection
- Credentials verification
- Database management
- Expirables management
- Sanction monitoring

CVO services (cont.)

- As the healthcare environment changes, services that some CVOs offer are expanding
  - Recruitment
  - Provider enrollment
  - Privileging
  - FPPE/OPPE
Brief history of CVOs

• 1980s: Development of centralized credentialing services within medical societies and hospital associations to streamline processes and reduce duplication for practitioners
• 1990s: Increase in need for credentialing by managed care organizations seeking NCQA accreditation resulting in external CVOs entering the market
• 2000s–present: Health systems and large health plans seeking further efficiencies by creating internal CVOs

Challenges for non-certified CVOs

• Expanding client base
• Supporting delegation oversight audits
• Marketing limitations due to lack of NCQA “seal of approval”
• Certification costs
• Additional burden placed on internal parent organization (e.g., health system or health plan)

BENEFITS OF CVO CERTIFICATION
**Certification benefits - CVO**

- Industry recognition
- Ability to attract more clients
- Reduce or eliminate delegation pre-assessment and oversight audits by clients
- Streamline parent organization accreditation process
- Improve ability to obtain delegated credentialing for parent organization’s employed practitioners

**Certification benefits - client**

- NCQA seal of approval
- Reduces internal resources to support delegated credentialing
  - Eliminates pre-delegation assessment and oversight audits for certified elements
- May streamline accreditation process

**CASE STUDY**

Non-certified CVO
Organization overview

- Single-state health system
  - 7 hospitals
  - Numerous outpatient facilities – ambulatory surgery centers, urgent care clinics, diagnostic centers, specialty clinics, primary care offices
  - Centralized credentialing department supporting 3500+ practitioners
  - Medical group of 225+ practitioners and growing
  - Managed care department supporting contracting and provider enrollment

Goals

- Obtain delegated credentialing with commercial 3rd party payers on behalf of medical group utilizing its centralized credentialing department services
- Obtain NCQA CVO certification to streamline delegation process

Steps taken

- Assigned project team
- Purchased NCQA CVO standards
- Performed gap analysis for CVO certification readiness
  - Review of current policies and procedures against NCQA CVO standards
  - File audit to determine level of compliance
- Evaluated findings
Steps taken (cont.)

- Ordered NCQA CVO application and evaluated information needed
- Developed project implementation plan and timeline
- Held weekly calls to evaluate progress, review policies, prepare CVO application

Results

Stay tuned....

OVERVIEW OF NCQA CVO CERTIFICATION
NCQA CVO certification

“The NCQA CVO Certification Program evaluates CVO management of many aspects of its credentials verification operation, as well as the process it uses for continuous improvement of services.”

NCQA Standards and Guidelines for the Certification of Credentialing Verification Organizations (CVO), effective July 1, 2016

Certification process

• Application
  – Free of charge; order online at www.ncqa.org
  – Determines eligibility for survey
    • Operational for at least 6 months at time of application
    • Currently providing verification services
    • Comply with federal, state and local laws
    • Errors and omissions insurance ($1M - $2M)
    • Non-discriminatory practices
  – Includes organization structure, certification options selected, contact information, type of survey

Certification process (cont.)

• CVO survey types
  – Full (initial and renewal)
  – Introductory (first time only)
    • Allows 2 surveys prior to decision
    • Initial – option to decline status if results are not favorable
    • Follow up - to re-evaluate elements scored 50% or less; organization may also include elements that scored 80%. Must occur within 12 months of initial survey; final score is combined results
  – Expedited - for organizations with Denied status that can demonstrate resolution in less than the required year and correction would raise its certification status
Certification Process (cont.)

• Submit electronically with signed agreements and application fee nine months prior to requested survey date
• Application review and determination
  – Approved
    • Survey date assigned
    • ASAR assigned (applications and scheduling account representative)

Certification Process (cont.)

• Interactive survey tool
  – Used for initial and renewal surveys
  – Upload all supporting documents for each CVO standard
  – Self-assessment of compliance
  – Surveyor conducts desktop review prior to onsite visit

Certification Process (cont.)

• Survey
  – Offsite review of submitted documentation
  – Onsite review of files and tour
    • 75 files processed within last 6 months are audited for documentation of certification elements
  – Clarify and/or obtain additional information as needed, e.g. interviews, documentation review, database queries
• Preliminary results
  – Review and comment
Certification process (cont.)

- Final decision
  - Review Oversight Committee (ROC)
  - Certified or denied
- Reconsideration
- Corrective action
  - May be required for currently certified CVOs non-compliant with elements or standards
  - Failure to correct in timely manner may result in lower score or reduction/loss of certification status

Certification process (cont.)

- Discretionary survey
  - Validates current certification decision
  - Concerns exist regarding continued performance
  - Certification status may be suspended during this survey
  - Right to request reconsideration if status changes
- Revocation of certification
  - CVO ceases to exist
  - Fraud or misrepresentation
  - Non-compliant with agreement or discretionary survey
  - Threat to patient safety or care

Certification standards

- Policies and Procedures (CVO 1)
- Continuous Quality Improvement (CVO 2)
- Protecting Credentialed Data (CVO 3)
- Verification Elements (11 options)
- Delegation (CVO 15)
Policies and procedures

• Detailed documentation of CVO’s processes for services provided to clients
  – Scope of practitioners
  – Verifications, sources and timeframes
  – Staff responsibilities
  – Reporting to clients or parent organization
  – Policy management process and approval

Policies and procedures – case study

• Some operational policies in place but identified need for new and/or updated policies
• Insufficient detail to fully support NCQA CVO standards
• Components missing regarding scope of practitioners, specific verification sources used, timeframes
• File audit confirmed verification sources and timeliness were compliant

Policies and procedures – tips and tools

• Document processes in sufficient detail
• Mirror bylaws where appropriate to ensure consistency (internal hospital CVO)
• Stay focused on NCQA standards only
• Ensure that review and approval are documented

Remember…
if it isn’t documented, it didn’t happen!
Continuous quality improvement

- Documented quality improvement plan and processes to provide accurate and complete information to clients
  - Scope
  - Goals and objectives
  - Methodology for assessing performance
  - Management of complaints
  - Annual review to identify trends and opportunities
  - Follow-up and implementation of improvements

Continuous quality improvement - case study

- Most challenging policy and procedure to develop
- Struggled with audit component; tendency to go above and beyond NCQA standards
- Initially developed onerous processes that could not be managed efficiently
- Refocused to only include NCQA elements; may expand in the future

Continuous quality improvement - tips and tools

- Utilize credentialing database reporting tools
- Create tracking log for complaints and compliments
- Review, track and trend QI results on regular basis
- Implement and document actions taken to improve process and client satisfaction
Protecting credentialing data

- Confidentiality
  - Release of information to third parties
  - Paper and electronic
  - Staff orientation
  - Confidentiality agreements
  - Appropriate destruction of confidential data
- Data access
  - During and after work hours
  - Building security

Protecting credentialing data (cont.)

- Employee orientation
- Database management
  - Passwords
  - Security access
  - Audit logs
  - Regular evaluation of activity
  - Back-ups and archives

Protecting credentialing data - case study

- Many elements in practice, but limited CVO documentation
- Formalized elements into one policy that included references to existing IT policies where applicable; also attached to CVO policy
- Implemented processes to support monitoring and compliance
Protecting credentialing data - tips and tools

- Answer the question “How?”
  - How do we keep information confidential?
  - How do we orient staff?
  - How do we monitor database access?
- Don’t rely solely on your IT department
- Can utilize IT policies but need to know what their processes are
  - Timing and storage of backups
  - How long to restore client information if database fails

Verifications

11 Certification Elements Available

- Licensure
- DEA or CDS
- Education and training
- Board certification status
- Work history
- Malpractice history
- License sanctions
- Medicare/Medicaid sanctions
- Application/attestation processing
- Application/attestation content
- Ongoing sanction monitoring

- Timeframes for reporting to client
  - 305 days for work history and application/attestation; 120 days for others
  - Allows 60 days for clients to review and make decisions
  - *Ongoing sanction monitoring defined by policy

Verifications - case study

- File audit demonstrated compliance with verification elements, sources and timeframes
- Updated policy to include more details
Verifications - tips and tools

- Create a verification table to support policy
  - Credentials elements
  - Requirements
  - Frequency
  - Timeframes
  - Sources
- Implement processes to monitor timeframes

Delegation

- Written delegation agreement
  - Mutually agreed upon
  - Delegated activities and responsibilities of both parties
  - Semi-annual reporting
  - Performance evaluation
  - Remedies available
- Pre-delegation assessment
- Annual oversight
- Opportunities for improvement

Delegation (cont.)

- Unable to delegate mandatory standards
  - Policies and procedures
  - Continuous quality improvement
  - Protecting credentialing data
CASE STUDY RESULTS

Progress to date

- Developed comprehensive set of NCQA-compliant policies and procedures
- Implemented appropriate changes to workflows
- Identified ways to better utilize technology for auditing
- Pending submission of CVO application and scheduled survey date

Questions