Better Credentialing + Less Legal Risk
+More Efficiency = NAMSS PASS!

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Who Are These Practitioners?
Who Are These Practitioners?
Additional Recent Notable Cases

• Dr. Michael Swango

• Dr. Christopher Duntsch
Our Legal Duty of “Due Diligence”

- The duty to select and retain competent medical staff extends to all healthcare facilities.
- It can be a costly error for smaller organizations to assume that only large medical institutions with ample resources are expected to scrutinize practitioners’ credentials or that larger institutions have less risk because they may recruit better practitioners (CNA HealthPro VP09-3).
- *Johnson v. Misericordia Hospital* (1981) – Healthcare entities are responsible not only for what they know, but also what they *should have known*.
Failure to Disclose Past Affiliations or Actions Taken at Past Affiliations

• *Dunbar v. Hosp. Auth. of Gwinnett County*, 182 S.E.2d 89 (Ga. 1971)
• *Johnson v. Misericordia Community Hospital*, 301 N.W.2d 156 (Wis. 1981)
• *Lapidot v. Memorial Medical Center*, 494 N.E.2d 838 (Ill. Ct. App. 1986)
• *Garrison v. Board of Trustees of Memorial Hosp. of Laramie County*, 795 P.2d 190 (Wyo. 1990)
• *Oskooi v. Fountain Valley Reg'l Hosp. and Medical Center*, 49 Cal.Rptr.2d 769 (Cal. Ct. App. 1996)
• *Daigle v. Stulc*, 794 F.Supp.2d 194 (D. Me. 2011)
Bringing Our Shared Vision to Reality

Introducing NAMSS PASS

Practitioner
Affiliation
Sharing Source
• What is the result of NAMSS PASS?
  • Better Credentialing
  • Less Legal Risk
  • More Efficient
The Ideal Credentialing Standards

1. Identity verification
2. Education/training/experience
3. ECFMG information
4. Military information
5. Professional licensure held in all states
6. DEA registration and state DPS certification
7. Board certification status
8. Practitioner affiliation history
9. Criminal background check
10. OIG/GSA/SAM Sanctions check
11. NPDB
12. Malpractice carriers
13. Insurance carrier certificate/reports
Our Agenda for Today

• The Five “W’s” of NAMSS PASS™ (What, Who, When, Where, and Why)

• Top 5 Challenges

• Costs vs. Benefits

• Top 5 Reasons to Participate
WHAT is NAMSS PASS?

*First* and *only* national centralized data repository to house primary source affiliation history
HOT NEWS!!

TJC Supports NAMSS PASS

“We do understand that a great many hospitals believe that this process (verifying past affiliations) is an important element of credentialing, and an important practice to promote quality and patient safety.....We applaud NAMSS’ commitment.. and hope that your continued program development proceeds smoothly and that NAMSS PASS becomes an effective resource for the health care field.”

Ana Pujols McKee, M.D.
Executive Vice President and Chief Medical Officer - The Joint Commission

David W. Baker, M.D.,MPH, FACP
Executive Vice President Healthcare Quality Evaluation - The Joint Commission
NAMSS PASS has the Ability to:

• obtain a practitioner’s affiliation history for all health care entities where he or she has been credentialed (as reported by those health care entities);

• instantaneously verify the affiliation information disclosed on application forms;

• perform a quick “gap analysis” to determine if any credentialing “red flags” are present; and

• immediately print “good standing” letters on the letterhead of the contributing hospitals, if available.
WHAT NAMSS PASS Accomplishes:

- Raises the national credentialing standard
- Unites the credentialing community
- Reduces the legal risk for negligent credentialing
- Creates a best practice affiliation letter for the credentialing community
- Establishes a national definition for “good standing” in the context of affiliation letters
- Creates efficiency in the verification process
- Eliminates unnecessary costs in the system
- Reduces the timeframe of on-boarding practitioners
- Demonstrates the significance of the role of MSPs!
WHAT NAMSS PASS Is **NOT**

- Credentialing software
- Centralized verification organization or service

**NO! NO! NO!**
WHO Benefits?

- Patients
- Practitioners/Applicants
- Other Members of the Medical Staff
- Hospitals and Healthcare Entities
- Medical Staff Professionals (MSPs) and Our Profession!
Feeling Overwhelmed?
WHEN?

• MSPs…Now is the Time!!
• Healthcare Changes
• Competitive
• Be Proactive with your Budget
• Professional Collaboration
• Lead Your Organization
WHERE?
WHY?

• Multiple Benefits — All of Which Are Compelling!

• It Is the Right Thing to Do!!
WHY?

Best Practice

- Verify full disclosure by comparing affiliation history with information disclosed on application
- Perform a “gap analysis” to determine if any red flags are present
- Obtain an immediate letter of “good standing” if available
What Does NAMSS PASS Look Like?
A Practitioner Profile shows a history of his/her healthcare affiliations with corresponding dates that can be verified with their application.

Photos are available from those facilities that provide them for additional identification.
A good standing letter can be printed immediately.

There are two template letters available that were designed and created by the NAMSS Board and one of the leading healthcare law firms, Hory, Springer, & Mattern.

If a letter is not available, the user is directed to contact the facility directly.
HMS Hospital
San Diego Campus

CONFIDENTIAL PEER REVIEW DOCUMENT
For Credentialing Use Only
Printed on behalf of HMS Medical Centers

02/25/2013

Andy Lock
HMS Medical Centers
4455 Morena Blvd
Suite 205
San Diego, CA 92117

Re: John Doe (License Number: LIC:1234567890) (State: )
To Whom It May Concern:

This letter is to respond to your request for primary source verification regarding the status of the above-referenced practitioner at HMS Medical Center. Please note the following information:

<table>
<thead>
<tr>
<th>Dates of Affiliation</th>
<th>Facility/Location</th>
<th>Specialty</th>
<th>Staff Category</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>5/1/2009 - 1/1/2011</td>
<td>West Campus</td>
<td>Family Medicine</td>
<td>Resigned</td>
<td>Good Standing</td>
</tr>
</tbody>
</table>

“Good Standing” means as follows:
1. Our Hospital evaluates the six ACGME general competencies (patient care, medical/clinical knowledge, practice-based learning, interpersonal and communication skills, professionalism, and system-based practice) as part of our appointment, reappointment, and privileging processes;
2. No adverse professional review action as defined in the Health Care Quality Improvement Act has been taken regarding this practitioner;
3. Specifically, neither the practitioner's staff membership nor clinical privileges have been reduced, restricted, suspended, revoked, denied, or not renewed. For purposes of this letter, "restricted" means that no mandatory concurrent consultation requirement has been imposed upon the practitioner (i.e., the practitioner must obtain a consult and the consultant must approve the course of treatment in advance); and
4. Our Hospital is unaware of any health issues that might affect the practitioner's ability to practice safely and competently.

If this information does not agree with your records or if you need additional information, please feel free to contact me at 858-274-6828.

Sincerely,

Andy Lock, John Smith
Credentials Coordinator
HMS Medical Center

Information in this letter last updated by HMS Medical Center on 02/25/2013
Query Confirmation Number: SAMPLE12345

• “Good Standing” letter
• Option #2
Definition of “Good Standing”

• “Good Standing” means that *no adverse professional review action* as defined in the Health Care Quality Improvement Act has been taken regarding this practitioner. That means that there has been no reduction, restriction, suspension, revocation, denial, or non-renewal of the practitioner’s staff membership or clinical privileges.

• “Restriction” means that a mandatory concurring consultation requirement has been imposed upon the practitioner (i.e., the practitioner must obtain a consult and the consultant must approve the course of treatment in advance).
What does it mean if a practitioner does not have a “good standing” letter?

- There are several reasons why a “good standing” letter may not be available, which may have no relevance to qualifications.
- The absence of a letter in the system simply means you need to contact the facility directly and contact information will be provided.
How does NAMSS PASS secure our data and why is it actually less risk than hosting our own website?

- Database is hosted at a top tier data center with state-of-the-art firewalls, highest encryption and authentication technology, and 365/24/7 staffed security and network monitoring.

- Practitioner data set does NOT contain any PHI, personal or confidential information. No SSN, no DOB, no credit card numbers, no addresses or phone numbers, no information that is not already in the public domain.

- Eliminates the risk of your own network security being open to the public for obtaining affiliation letters. NAMSS PASS is a completely separate secured network. Therefore your confidential practitioner data set and possibly patient information is not at risk because you offer web accessible letters.
Top 5 Challenges
Challenge #1

• We already purchased a web-based letter response system and don’t want to pay for another one. Why should we contribute data for others to print our letters that we already have in our system?
Challenge #2

• I do not feel comfortable explaining this to my Medical Staff Leadership. What resources are available that can help me obtain leadership buy-in?
Challenge #3

• Can my current software export affiliation data into NAMSS PASS™?
  • Simple uploads through an Excel file (no assistance needed from your vendor or IT Staff)
  • Uploads can be automated
  • Electronic Connectivity Program (ECP) allows existing credentialing software to interface directly with NAMSS PASS to further automate the process.
Challenge #4

• Our legal counsel does not agree with the narrow definition of “Good Standing” and neither of the two letter options are acceptable to counsel.

• What can I do?
  • Educate your legal counsel and the credentialing community!
  • Within the data file, you assign a numeric designation of “0”
  • Use your existing letter content with our Custom Letter option.
Challenge #5

- Will this require a change in my organization’s Bylaws?
- Will there be a need to request additional releases from our practitioners to share or provide data on NAMSS PASS™?
Costs vs. Benefits
# What are the Fees?

<table>
<thead>
<tr>
<th>Basic Service at No Charge</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contribute Affiliation Data</td>
</tr>
<tr>
<td>Add Additional Users</td>
</tr>
<tr>
<td>Browse Practitioners and Facilities</td>
</tr>
<tr>
<td>Auto-Response Print of Your Good Standing Letters to Other Entities</td>
</tr>
<tr>
<td>Gap Analysis History Research</td>
</tr>
</tbody>
</table>
What are the Fees?

Fees are only applicable when you query other facilities
(for Contributing Entities)

• For an average entity with 500 active practitioners - $500 per year. ($1 per practitioner per year for unlimited access).

• For an entity with 1000 active practitioners - $800 per year. (20% discount for over 1000 practitioners - $.80 per practitioner).

• Alternatively, individual letter credits can be purchased starting at $3 less 20% discount if you contribute data.

• Please refer to NAMSS PASS Fees document for details.
Cost Comparisons

- Based on MSP wage at $20/hr.

<table>
<thead>
<tr>
<th>Costs in Responding to 3&lt;sup&gt;rd&lt;/sup&gt; Party Verification Requests</th>
<th>NAMSS PASS</th>
</tr>
</thead>
<tbody>
<tr>
<td>30 minutes</td>
<td>$10.00</td>
</tr>
<tr>
<td>Letterhead, ink, fax, postage costs</td>
<td>$3.00</td>
</tr>
<tr>
<td>Cost per Letter</td>
<td>$13.00</td>
</tr>
<tr>
<td>100 Letters per Month</td>
<td>$1,300.00/ month</td>
</tr>
</tbody>
</table>

- Subscription for 1,000 practitioners: $1,000.00
- No resources: $0.00
- 20% Discount if 1,000+ practitioners: -$200.00
- Unlimited queries and letters: $67.00/ Month ($800/yr)
## Cost Comparisons

- Based on MSP wage at $20/hr.

<table>
<thead>
<tr>
<th>Costs in Verifying Affiliation History</th>
<th>NAMSS PASS</th>
</tr>
</thead>
<tbody>
<tr>
<td>30 minutes (including 2-3 follow-up attempts)</td>
<td>$10.00</td>
</tr>
<tr>
<td>Letterhead, ink, fax, postage, webcrawls</td>
<td>$3.00</td>
</tr>
<tr>
<td>Cost per Letter</td>
<td>$13.00</td>
</tr>
<tr>
<td>100 Letters per Month</td>
<td>$1,300.00/month</td>
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</tbody>
</table>
Cost Comparisons

- Based on MSP wage at $20/hr.

<table>
<thead>
<tr>
<th>Costs for BOTH Responding and Verifying</th>
<th>NAMSS PASS</th>
</tr>
</thead>
<tbody>
<tr>
<td>100 Letters per Month</td>
<td>Unlimited queries and letters</td>
</tr>
<tr>
<td>$2,600.00/month</td>
<td>$67.00/Month ($800/yr)</td>
</tr>
</tbody>
</table>
Top 5 Reasons to Participate
Top 5 Reasons to Participate

#5

Increase Efficiencies with Technology
Top 5 Reasons to Participate

#4

Basic Service of Uploading Data — for the Good of the Industry — Is FREE
Top 5 Reasons to Participate

#3

Establish Your Significance as an MSP for Patient Safety and Due Diligence
Top 5 Reasons to Participate

#2

Reduce Risk of Negligent Credentialing
Top 5 Reasons to Participate

#1

Raising the Bar for Patient Safety
Top Ten Dangerous Doctors Are Poster Children for Patient Safety Reform

by Consumer Watchdog

Ultimately, success depends on you!
Any Questions?

www.namss.org

NAMSS PASS