**Washington Credentialing Standardization Group
Shared Delegation Audit Program
Best Practice Tool for Ongoing Monitoring**

This best practice tool was created by the Washington Credentialing Standardization Group, Shared Delegation Audit Program to assist Medical Groups that have taken on the responsibility of performing ongoing monitoring activities on behalf of a Health Plan.

The following Health Plan accreditation and regulatory requirements regarding ongoing monitoring of practitioner sanctions, complaints and quality issues between recredentialing cycles must be met:

| Activity | Required by | Acceptable Sources | Timeframe |
| --- | --- | --- | --- |
| Collects and reviews Medicare and Medicaid sanctions | NCQA, CMS, URAC | * [Office of Inspector General, List of Excluded Individuals/Entities](https://oig.hhs.gov/exclusions/exclusions_list.asp)
* NPDB Continuous Query
* Note: Health Plans with Medicare/Medicaid lines of business will require checking the Office of Inspector General, List of Excluded Individuals/Entities directly to meet CMS recommendation. The organization may use a vendor, if the vendor is directly checking the list.
 | within 30 calendar days of its release by the reporting entity |
| Collects and reviews sanctions or limitations on licensure | NCQA, CMS, URAC | * [Washington State Department of Health, News Releases](https://www.doh.wa.gov/Newsroom)
* All other state licensing agencies where practitioners provide care to Health Plan members.
* NPDB Continuous Query
 | within 30 calendar days of its release by the reporting entity |
| Collects and reviews complaints | NCQA, CMS | * The organization evaluates the history of complaints for all practitioners at least every six months.
 | every six months |
| Collects and reviews information from identified adverse events | NCQA, CMS | * The organization monitors for adverse events at least every six months.
 | every six months |
| Collects and reviews the Medicare Opt Out List | CMS | * [Medicare Opt Out Affidavits (data.CMS.gov website)](https://data.cms.gov/dataset/Opt-Out-Affidavits/7yuw-754z)
 | at least quarterly |
| Collects and reviews Medicare and Medicaid sanctions | CMS | * [System for Award Management](https://www.sam.gov/portal/SAM/?portal:componentId=220e071f-e75f-417d-9c61-027d324c8fec&interactionstate=JBPNS_rO0ABXc0ABBfanNmQnJpZGdlVmlld0lkAAAAAQATL2pzZi9mdW5jdGlvbmFsLmpzcAAHX19FT0ZfXw**&portal:type=action#1)
* Note: If the organization choses to use the NPDB Continuous Query, be aware that SAM is not included, and the organization must still query SAM. The organization may use a vendor.
 | monthlyFor Medicaid lines of business must be run by 15th of the month.  |
| Collects and reviews state Medicaid sanctions and exclusions  | CMS | * Medicaid Provider Termination & Exclusion List(s)
	+ Washington: <https://www.hca.wa.gov/billers-providers/apple-health-medicaid-providers/provider-termination-and-exclusion-list>
	+ Idaho: <http://healthandwelfare.idaho.gov/AboutUs/FraudReportPublicAssistanceFraud/tabid/136/Default.aspx>
* Note: Some Health Plans with Medicaid lines of business require delegates to verify that the practitioner is not terminated or excluded in any state that they are practicing.
 | monthly |

* For all applicable activities, the Medical Group must describe its processes in policies and procedures and produce evidence of ongoing monitoring. The Medical Group must also describe in policies and procedures what interventions it will implement if there is evidence of poor quality that could affect the health and safety of the Medical Group’s patients.
* At a minimum, ongoing monitoring logs must document the following: date of the report (date information was released by the reporting entity); date the Medical Group reviewed the report; findings; and initials of staff member who performed the review.
* If the Medical Group uses the NPDB Continuous Query for ongoing monitoring, proof of annual enrollment must be present in each credentialing file, and the Medical Group must demonstrate that continuous query notifications are viewed within 30 calendar days of a new alert. The Medical Group must document review of each new alert on an ongoing monitoring log.
* The Medical Group must check for sanctions or limitations on licensure in all states that practitioner provides care to the Medical Group’s patients.
* Regarding the collection and review of complaints and adverse events, the Medical Group may document ongoing monitoring on a log or submit a report to the Credentialing Committee and document review in meeting minutes.
* If the Medical Group delegated an activity to an NCQA Certified CVO, the Medical Group must state this in policies and procedures. The delegation agreement must describe the delegated activity and the Medical Group must produce evidence of ongoing monitoring.
* If the Medical Group uses a vendor to perform ongoing monitoring, the Medical Group must state this in policies and procedures. The vendor agreement must describe the purchased services, and the Medical Group must produce evidence of ongoing monitoring.
* The following documents are sample ongoing monitoring logs to help you in documenting your activities. Your ongoing monitoring logs must be available during your annual WCSG SDA audit.

**DISCLAIMER: Please review the Credentialing Delegation Agreement and/or Contract with each Health Plan that delegates credentialing activities to your organization. Some Health Plans may delegate additional ongoing monitoring activities and/or have more stringent timeframe requirements. If you have questions, please consult with each Health Plan that delegates to your organization.**

**2018 Ongoing Monitoring Log
Medicare and Medicaid Sanctions
OIG/LEIE Database**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Month | Date of Report | Date Reviewed | Findings | Checked by |
| January 2018 | 02/07/18 | 02/15/18 | No matches found. | MP |
| February 2018 |  |  |  |  |
| March 2018 |  |  |  |  |
| April 2018 |  |  |  |  |
| May 2018 |  |  |  |  |
| June 2018 |  |  |  |  |
| July 2018 |  |  |  |  |
| August 2018 |  |  |  |  |
| September 2018 |  |  |  |  |
| October 2018 |  |  |  |  |
| November 2018 |  |  |  |  |
| December 2018 |  |  |  |  |

**2018 Ongoing Monitoring Log
Sanctions or Limitations on Licensure
Washington State Department of Health News Releases**

|  |  |  |  |
| --- | --- | --- | --- |
| Date of Report | Date Reviewed | Findings | Checked by |
| 01/06/18 | 01/09/18 | No matches found.  | MP |
| 01/18/18 | 01/18/18 | No matches found.  | MP |
| 01/19/18 | 01/19/18 | No matches found.  | MP |
| 01/20/18 | 01/23/18 | No matches found.  | MP |
| 01/26/18 | 01/26/18 | No matches found.  | MP |
| 01/27/18 | 01/27/18 | No matches found.  | MP |
| 01/30/18 | 01/31/18 | No matches found.  | MP |
| 01/30/18 | 01/31/18 | Agreed order for John Doe, MD. Forwarded to Credentialing Committee for review.  | MP |
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**2018 Ongoing Monitoring Log
NPDB Continuous Query**

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| --- | --- | --- | --- |
| Date of Report | Date Reviewed | Findings | Checked by |
| 02/07/18 | 02/15/18 | Medical Malpractice Payment report for John Doe, MD. | MP |
| 02/16/18 | 02/16/18 | Medical Malpractice Payment report for Susan Smith, ARNP.  | MP |
| 03/15/18 | 03/15/18 | Adverse Action Report for John Doe, MD. Forwarded to Credentialing Committee for review.  | MP |
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**2018 Ongoing Monitoring Log
Member Complaints**

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| --- | --- | --- | --- |
| Date of Report | Look Back Period | Findings | Checked by |
| 01/10/18 | 07/01/17-12/31/17 | The Credentialing Committee reviewed a report on the history of all complaints for all practitioners during the look back period. No trends were identified.  | MP |
| 07/11/18 | 01/01/18-06/30/18 | The Credentialing Committee reviewed a report on the history of all complaints for all practitioners during the look back period. No trends were identified. | MP |
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**2018 Ongoing Monitoring Log
Adverse Actions**

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| --- | --- | --- | --- |
| Date of Report | Look Back Period | Findings | Checked by |
| 01/10/18 | 07/01/17-12/31/17 | The Credentialing Committee reviewed a report on the history of all adverse actions for all practitioners during the look back period. No trends were identified.  | MP |
| 07/11/18 | 01/01/18-06/30/18 | The Credentialing Committee reviewed a report on the history of all adverse actions for all practitioners during the look back period. No trends were identified. | MP |
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**2018 Ongoing Monitoring Log
Medicare Opt Out List
Data.CMS.gov Opt Out Affidavits List**

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| --- | --- | --- |
| Date Checked | Findings | Check by |
| 02/15/18 | No matches found. | MP |
| 03/15/18 | No matches found. | MP |
| 04/15/18 | No matches found.  | MP |
| 05/15/18 | No matches found.  | MP |

**2018 Ongoing Monitoring Log
Medicare and Medicaid Sanctions
SAM Database**

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| --- | --- | --- | --- | --- |
| Month | Date of Report | Date Reviewed | Findings | Checked by |
| January 2018 | 02/07/18 | 02/15/18 | No matches found. | MP |
| February 2018 |  |  |  |  |
| March 2018 |  |  |  |  |
| April 2018 |  |  |  |  |
| May 2018 |  |  |  |  |
| June 2018 |  |  |  |  |
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| August 2018 |  |  |  |  |
| September 2018 |  |  |  |  |
| October 2018 |  |  |  |  |
| November 2018 |  |  |  |  |
| December 2018 |  |  |  |  |

**2018 Ongoing Monitoring Log
State Medicaid Sanctions and Exclusions**

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| --- | --- | --- | --- |
| Month | Date Reviewed | Findings | Checked by |
| January 2018 | 02/15/18 | No matches found. | MP |
| February 2018 |  |  |  |
| March 2018 |  |  |  |
| April 2018 |  |  |  |
| May 2018 |  |  |  |
| June 2018 |  |  |  |
| July 2018 |  |  |  |
| August 2018 |  |  |  |
| September 2018 |  |  |  |
| October 2018 |  |  |  |
| November 2018 |  |  |  |
| December 2018 |  |  |  |

Note: Practitioners employed or contracted with [insert your organization name here] practice in Washington State only; and therefore, only the Washington State Medicaid Provider Termination & Exclusion List is checked monthly as part of ongoing monitoring.

Note: Practitioners employed or contracted with [insert your organization name here] practice primarily in Washington State with some in Idaho; and therefore, both the Washington and Idaho State Medicaid Provider Termination & Exclusion Lists are checked monthly as part of ongoing monitoring.