**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 | * NPDB Continuous Query; **or**
* [Office of Inspector General, List of Excluded Individuals/Entities](https://oig.hhs.gov/exclusions/exclusions_list.asp)
* 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 entityFor Medicaid lines of business OIG must be run by 15th of the month. |
| Collects and reviews sanctions or limitations on licensure | NCQA, CMS, URAC | * NPDB Continuous Query; **or**
* [[Washington Medical Commission Newsletter (MD/PA) – a quarterly publication; **and**](https://wmc.wa.gov/resources/newsletter)](https://wmc.wa.gov/resources/newsletter)
* [[Washington Medical Commission Press Releases s (MD/PA); **and**](https://wmc.wa.gov/news-announcements)](https://wmc.wa.gov/news-announcements)
* [Washington State Department of Health, News Releases (all other practitioner types); **and**](https://www.doh.wa.gov/Newsroom)
* All other state licensing agencies where practitioners provide care to Health Plan members.
 | 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)
 | within 30 calendar days of its release by the reporting entity |
| Collects and reviews Medicare and Medicaid sanctions | CMS | * [System for Award Management](https://www.sam.gov/SAM/pages/public/extracts/samPublicAccessData.jsf)
* 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.
 | within 30 calendar days of its release by the reporting entityFor Medicaid lines of business must be run by 15th of the month. |
| Preclusion List | CMS | * Preclusion List
* Note: Some Health Plans with Medicare lines of business may require checking the Preclusion List. The Health Plan is responsible for sending the Preclusion List to the Medical Group.
 | MonthlyWithin five (5) working days of receipt |
| 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. The organization may use a vendor.
 | within 30 calendar days of its release by the reporting entity |

* 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.**

**2021 Ongoing Monitoring Log
Medicare and Medicaid Sanctions

OIG/LEIE Database**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Month | Date of Report | Date Reviewed | Findings | Checked by |
| January 2021 | 02/07/21 | 02/15/21 | No matches found. | MP |
| February 2021 |  |  |  |  |
| March 2021 |  |  |  |  |
| April 2021 |  |  |  |  |
| May 2021 |  |  |  |  |
| June 2021 |  |  |  |  |
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| October 2021 |  |  |  |  |
| November 2021 |  |  |  |  |
| December 2021 |  |  |  |  |

**2021 Ongoing Monitoring Log
Sanctions or Limitations on Licensure

Washington Medical Commission Press Releases
Washington Medical Commission Newsletters
Washington State Department of Health News Releases**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Date of Report | Date Reviewed | Findings | Source | Checked by |
| 01/06/21 | 01/09/21 | No matches found.  | Winter 2020 Newsletter | MP |
| 01/21/21 | 01/21/21 | No matches found.  | DOH News Release | MP |
| 01/21/21 | 01/21/21 | No matches found.  | Medical Commission | MP |
| 01/21/21 | 01/23/21 | No matches found.  | DOH News Release | MP |
| 01/26/21 | 01/26/21 | No matches found.  | DOH News Release | MP |
| 01/27/21 | 01/27/21 | No matches found.  | DOH News Release | MP |
| 01/30/21 | 01/31/21 | No matches found.  | DOH News Release | MP |
| 01/30/21 | 01/31/21 | Agreed order for John Doe, MD. Forwarded to Credentialing Committee for review.  | Medical Commission | MP |
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**2021 Ongoing Monitoring Log

NPDB Continuous Query**

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| --- | --- | --- | --- |
| Date of Report | Date Reviewed | Findings | Checked by |
| 02/07/21 | 02/15/21 | Medical Malpractice Payment report for John Doe, MD. | MP |
| 02/16/21 | 02/16/21 | Medical Malpractice Payment report for Susan Smith, ARNP.  | MP |
| 03/15/21 | 03/15/21 | Adverse Action Report for John Doe, MD. Forwarded to Credentialing Committee for review.  | MP |
| 4/1/21-4/30/21 | 5/1/21 | For the month of April no reports were received | MP |
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**2020-2021 Ongoing Monitoring Log

Member Complaints**

|  |  |  |  |
| --- | --- | --- | --- |
| Date of Report | Look Back Period | Findings | Checked by |
| 07/11/20 | 01/01/20-06/30/20 | 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 |
| 01/10/21 | 07/01/20-12/31/20 | 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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**2020-2021 Ongoing Monitoring Log

Adverse Actions**

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| --- | --- | --- | --- |
| Date of Report | Look Back Period | Findings | Checked by |
| 07/11/20 | 01/01/20-6/30/20 | 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 |
| 01/01/21 | 07/01/20-12/31/20 | 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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**2021 Ongoing Monitoring Log

Medicare Opt Out List
Data.CMS.gov Opt Out Affidavits List**

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| --- | --- | --- | --- | --- |
| Month | Date of Report | Date Checked | Findings | Check by |
| January 2021 | 02/01/21 | 02/15/21 | No matches found. | MP |
| February 2021 | 03/05/21 | 03/15/21 | No matches found. | MP |
| March 2021 | 04/08/21 | 04/15/21 | No matches found.  | MP |
| April 2021 | 05/02/21 | 05/15/21 | No matches found.  | MP |

**2021 Ongoing Monitoring Log

Medicare and Medicaid Sanctions
SAM Database**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Month | Date of Report | Date Reviewed | Findings | Checked by |
| January 2021 | 02/07/21 | 02/15/21 | No matches found. | MP |
| February 2021 |  |  |  |  |
| March 2021 |  |  |  |  |
| April 2021 |  |  |  |  |
| May 2021 |  |  |  |  |
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| December 2021 |  |  |  |  |

**2021 Ongoing Monitoring Log

Preclusion List**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Month | Date of Report | Date Reviewed | Findings | Checked by |
| January 2021 | 02/07/21 | 02/15/21 | No matches found. | MP |
| February 2021 |  |  |  |  |
| March 2021 |  |  |  |  |
| April 2021 |  |  |  |  |
| May 2021 |  |  |  |  |
| June 2021 |  |  |  |  |
| July 2021 |  |  |  |  |
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| December 2021 |  |  |  |  |

**2021 Ongoing Monitoring Log

State Medicaid Sanctions and Exclusions**

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| --- | --- | --- | --- | --- |
| Month | Date of Report | Date Reviewed | Findings | Checked by |
| January 2021 | 02/01/21 | 02/15/21 | No matches found. | MP |
| February 2021 |  |  |  |  |
| March 2021 |  |  |  |  |
| April 2021 |  |  |  |  |
| May 2021 |  |  |  |  |
| June 2021 |  |  |  |  |
| July 2021 |  |  |  |  |
| August 2021 |  |  |  |  |
| September 2021 |  |  |  |  |
| October 2021 |  |  |  |  |
| November 2021 |  |  |  |  |
| December 2021 |  |  |  |  |

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.