Credentialing Office Policy and Procedure

Title: PROTECTION OF THE CONFIDENTIALITY OF PROFESSIONAL STAFF RECORDS  Policy Number: CO 1.2

Regulation Reference: NCQA CR1.A, CR1EC.4

Effective Date: 4/1/2012
Annual Review Date: 3-26-19, 1-30-20, 2-23-21

Policy Statement:

It is the policy of Paul L. Foster School of Medicine (PLFSOM) to provide a safe, permanent repository for files of all Professional Staff members and applicants. Accordingly, disclosure of Professional Staff records shall only be permitted under the conditions set forth in this Policy and Procedure.

Procedure:

1. Location and Security Precaution

   Each member of the Professional Staff has a credentials file on the credentialing electronic and/or paper file that is maintained in the Credentialing Office.

   Paper files are stored in locked filing cabinets, in a locked room, only accessible by the Credentialing Office personnel. The building where this filing room is located can only be entered by personnel with a TTUHSC El Paso security badge. The file cabinets shall be locked except during such times Credentialing Office personnel is physically present.

   The security of the credentialing database system has the following password-protective requirements:
   - Password must not contain the user's name.
   - Password must contain one English character (A through Z).
   - Password must contain one Base 10 digit (0 through 9).
   - Password must contain one non-alphanumeric character (e.g., !, $, #).
   - Password must be changed every 90 days
   - Minimum unique passwords: 1

   and are also in accordance with the Texas Tech University Health Sciences Center El Paso (TTUHSCEP) Operating Policy and Procedure HSCEP OP: 56.01, HSCEP OP: 52.09 A. #2, #6, and HSCEP OP: 52.06, X and XI.

   The Human Resources department provides a monthly employee termination report to the Director of the Credentialing Office, this report in turn is used to inactivate credentialing database access for all employees/personnel who have left TTUHSCEP.

   The credentialing database system is accessed by approved Credentialing Office personnel. Each are assigned a unique username and password, with the above password protective requirements, staff is instructed to avoid writing down passwords.

   The credentialing database system has an audit log capability, which allows the Director and Manager to be able to view all additions and modifications by user, which includes the date of when the action was performed for each provider. When the Credentialing Office personnel needs to replace or update
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renewed data or documentation, they do not delete anything from the credentialing database system. Their function is to place all expired information/documentation as “Inactive”, and then open an “Active” shell with the new or updated information/documentation.

2. Access by Personnel

Departmental Chairs or designees, PLFSOM Credentials Committee members, MPIP Policy Committee members, the Dean or designee and the Credentialing Office Staff shall have access to professional staff records only to the extent necessary to perform official functions.

a. Access by Personnel above or Professional Staff Functions

- All requests for Professional Staff Records by personnel shall be made to the Credentialing Office Director. A person permitted access under this policy shall be given a reasonable opportunity to inspect the records in question, under supervision and to make notes, but will not be allowed to remove them from the Credentialing Office or to make copies of them. Removal or copying shall only be allowed upon the permission of the Associate Dean Office of Clinical Affairs or his/her designated representative.

- Departmental Chairs or designees shall have access to all Professional Staff records pertaining to the activities of their respective departments.

- Professional Staff Committee members shall have access to the files in committee meetings of which they serve and to the credential and peer review files of practitioners whose competency or performance the committee is reviewing.

b. Access by Practitioners to their own Professional Staff Credentials Files

A practitioner may have supervised access to his/her own files during office hours (8 a.m. – 5 p.m.). The files may not be removed and may be read only in the presence of Credentials Office personnel. If any complaints are contained in the files, a written summary of complaints, deleting the names of the persons making the reports, will be placed in the files before it is made available to the individual practitioner. The Credentialing Office shall notify the individual when a written summary is required. If a written summary is required, it will take approximately two days before the files will be made available to the particular practitioner. This policy does not require PLFSOM to allow a practitioner to review references or recommendations or other information that is peer review protected. These will be removed from the file before review.

c. Access by other PSFSOM officials will only be permitted, if approved by the Office of General Counsel.

3. Request by Persons or Organizations Outside of PLFSOM or its Professional Staff

a. Routine Requests for Information: If a practitioner has not encountered disciplinary or peer review problems at PLFSOM, or been denied privileges at PLFSOM, then Credentialing personnel may respond to a request from another hospital or its medical staff. The request must be
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accompanied by the practitioner’s signed consent to release information statement. Such routine requests must include notification that the practitioner is a member of or applicant to institutions Medical Staff. Disclosure of information shall be limited to the following: practitioner’s status and category, dates affiliated with PLFSOM, and type of privileges granted.

b. If a practitioner has been the subject of corrective action at PLFSOM, special care must be taken. All responses to inquiries regarding that practitioner shall be reviewed and approved by the Director of Credentialing Office who will seek consultation from Legal Counsel.

4. Request by Accrediting Organization, Governmental Surveyors or Managed Care Organizations

Surveyors associated with accrediting, governmental or managed care organizations (TJC, NCQA, TDI, BCBS, Aetna, etc.) shall be entitled to inspect Professional Staff Records provided that the surveyor has:

a. Specific statutory, regulatory, or other authority to review the requested materials, and

b. Provided a written statement that the materials sought are directly relevant to the matter being investigated, and

c. That the materials are the most direct and least intrusive means to carry out the survey or a pending investigation, bearing in mind that credentials/quality files regarding individual practitioners are strictly confidential.

The surveyor may inspect Professional Staff Records via one of the following:

1. On the premises in the presence of Credentialing Office personnel provided that no originals or copies are removed from the premises; and/or

2. Secure desktop audit file submission via the following methods: secure email attachments, flash/thumb drive password protected, virtual access (auditor is allowed access to secure Texas Tech system, or the health plan allows Credentialing Office personnel to share files in their secure system), or overnight mail service (FedEx, UPS)

5. Subpoenas

All subpoenas of Professional Staff Records shall be referred to the PLFSOM Office of General Counsel Professional Liability Division.

6. Confidentiality Statement Form

All Committee and staff members shall review and sign the confidentiality statement form annually.

7. Professional Staff Records Retention

All professional staff records must be archived for 11 years, starting from termination/inactivation date from the professional staff.

8. Policy CO 1.2 will be reviewed with any new hiring staff or members of the Credentials Committee, within 90 days of hire. Policy will be reviewed with all staff and committee members on an annual basis as part of employee training / annual review of policies.

9. Integrity of Credentialing Files
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Per policy CO 1.3 – Right of Notification and Correction of Information, CO 1.5 – Initial Application / Appointment to Professional Staff, and CO 1.6 – Reappointment / Re-credentialing Application to Professional Staff are received via mail, email, or fax. Staff will date stamp and initial all received application forms, supporting documentation, primary source verifications, and any corrections by the practitioner or primary source verification. All documents received are reviewed by the Credentialing Office staff and tracked via the provider checklist and electronic database.

Documents received are never modified by the Credentialing Office. Updates are only made to the database system when corrected forms are received by the provider or the primary source verification, in order to maintain accuracy of provider’s data.

Credentialing Director or Manager will review the credentialing staff work at the time of initial credentialing and at the time of each subsequent re-credentialing, the provider profile will be signed and dated by the reviewer. Additionally, external audits feedback will be reviewed annually.

Annually at the end of each year, the Credentialing Director or Manager will review 20 provider files in the credentialing database system (10 initial appointments and 10 re-credentialing appointments). The files reviewed and their results, will be recorded in the monitoring log. The review will focus on the integrity of the credentialing process and files, to make certain no changes, deletions, or modifications were made that were not in line with the credentialing process / findings from primary source verifications. This will ensure that only the approved changes / modifications were made. Any identified concerns or poor quality related findings, will be addressed accordingly and by following the institutions Texas Tech University System Regulation 07.07 – Employee Conduct, Coaching, Corrective Action, and Termination policy process.

Electronic documents are stored in the departments password protected credentialing database, or individual TTUHSC El Paso Credentialing Office personnel computer systems, as mentioned in #1, and only accessible by the Credentialing Office or any approved TTUHSCEP personnel, and who will comply with TTUHSCEP Operating Policy and Procedure HSCEP OP: 56.01, HSCEP OP: 52.09 A. #2, #6, and HSCEP OP: 52.06, X and XI.

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<td>Juan B. Figueroa, M.D., Chair, TTUHSCEP PLFSOM Credentials Committee and Director of Clinical Operations</td>
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