



NAMSSTM

EDUCATION. ADVOCACY. PATIENT SAFETY.

Payer Delegation

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How are we going to roll today?

- Defining what delegation means to you
- Discussing NCQA guidelines for delegation
- Looking at a sample delegation contract
- Examining Compliance Measures

Who are you and where are you from?

- *Di Hall – MSP since 1993*
 - *Married to Ike, who is the Radiation Safety Officer at Emory University Hospital (Atlanta)*
 - *We like penguins*
 - *Dually Certified by NAMSS as well as being a Fellow*
 - *Have worked at MDA/CREDENT since 2006.*
 - *CREDENT is certified by the National Committee for Quality Assurance (NCQA) for 11 out of 11 elements through September 2021.*

Delegation – what is it good for?

- What is it?
- Why do it?
- Who allows it?
- How do we do it?

What is NCQA?

National Committee for Quality Assurance

- An independent, nonprofit institution established in 1979.
- It is recognized as the leading independent accrediting body of Health Plans (HPs) and other managed care entities, including CVOs in the United States.



So what does NCQA say about Delegation?

NCQA HP Credentialing Standards Delegation of Credentialing

A written document that is mutually agreed upon and describes -

- responsibilities of both the delegator and the delegated entity
- delegated activities

So what does NCQA say about Delegation?

NCQA HP Credentialing Standards Delegation of Credentialing

- process used by the delegator to evaluate the delegated entity's performance
- delegator's remedies if the delegated entity does not fulfill its obligations
- delegator must review regular (at a minimum semi-annual) delegate reports

So what does NCQA say about Delegation?

NCQA HP Credentialing Standards Delegation of Credentialing

- Should also include privacy and confidentiality protections. (HIPAA – Health Insurance Portability and Accountability Act of 1996)

Why is HIPPA important?

So what does NCQA say about Delegation?

NCQA HP Credentialing Standards Delegation of Credentialing

- PHI – Protected Health Information!
 - Allows for PHI usage by delegate (if needed!)
 - Delegate safeguards against improper use/release (and what THEIR sub-delegates do as well)
 - Inform delegator of any issues with PHI use/release
 - Return, destruction, protection of PHI at end of delegation agreement

So what does NCQA say about Delegation?

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The delegator must retain the right to approve new practitioners, providers, and sites - and when necessary to terminate or suspend individual practitioners or providers based on quality issues

So what does NCQA say about Delegation?

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The delegator must review five percent or fifty of the delegated entity's credentialing files, whichever is less, as evidence of its oversight. A minimum of 10 initial credentialing and 10 recredentialing files must be reviewed.

(Audit requirement is eliminated if CVO/delegated entity is NCQA certified.)

Delegation Agreement - Sample

Elements of an Agreement

- Obligations
- Responsibilities
- Oversight
- PHI
- Insurance
- Compensation/Expenses
- Delivery of Information

Delegation Agreement - Sample

Elements of an Agreement

- Exculpation (exonerate)
- Term of Agreement
- Termination
- Performance Evaluation
 - Correction Action Plans
 - Mediation/Arbitration
- Illegality

Delegation Agreement - Sample

Elements of an Agreement

- Assignment
- Governing Law
- Certification/Compliance
- Authority
- Exhibits/Attachments
 - Pricing
 - Elements for verification
 - Other Services Covered

Compliance Measures - Delegator

- What are your expectations?
 - Format of Data
 - Format of Delivery
 - Timeliness of Data Delivery
 - Verifications
 - Copy of verification
 - Provider profile of element/date/verifier
 - Other

Compliance Measures - Delegate

- Reporting Outliers
- Measuring internal compliance
 - Completeness
 - Accuracy
 - Timeliness
- Other

Auditing – friend or foe?

- Set up a calendar
- Make a formal request
 - Date/Time
 - Number of files
 - What is being audited
- Provide immediate feedback

Auditing Tips & Tricks

- Be comfortable!!
- Be friendly!
- Make expectations/needs known before date of audit.
- Prepare audit tools/files.
- Communicate, communicate, communicate!

What are your tips?

Questions?

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