

Compliance Today - June 2022 A healthcare facility badging primer: How to improve vendor credentialing compliance

By Jennifer Williams, RN, MBA, PhD, JD

Jennifer Williams (jwilliams@qhx.com) is Director of Market Development & Education, Credentialing, Global Healthcare Exchange (GHX), Louisville, CO.

The COVID-19 pandemic has significantly affected the healthcare landscape, resulting in the need for more comprehensive safety and security programs. While this concept is not novel, the pandemic has brought more attention to these programs. As a result, hospitals and health systems are reevaluating and reinvesting in vendor credentialing and visitor management programs, a specialized area of healthcare compliance. At the center of these programs is a commitment to creating safer environments for patients, staff, and the organization as a whole. Fortifying these programs is not optional.



Williams

What is vendor and visitor credentialing?

Vendor credentialing is a subset of a health system compliance program. Obtaining a compliant badge to gain entrance into a health system is one example of vendor credentialing. For instance, in the United States, healthcare industry representatives (HCIRs), including vendors and vendor representatives, should be vetted and credentialed to help ensure compliance with the health system's credentialing requirements. This credentialing process should occur before allowing virtual or physical entrance into the healthcare facility for business or clinical purposes. Compliance programs also include visitor management. Visitor management is the process of authorizing individuals who seek to visit someone in the healthcare facility. This type of management system generally supports visitor watch lists and alerts and enables detailed reporting.

Given the wide-ranging disruptions caused by the COVID-19 pandemic, it is more important than ever for health systems to help ensure that everyone walking their halls, including HCIRs and visitors, is compliant with their policies. Whether health systems have 25 or 2,500 HCIRs to account for, a complete and robust credentialing compliance program is a business necessity. To best implement such a robust program, health systems should focus on ensuring all HCIRs within a health system are "fully badge-compliant." In this case, fully badgecompliant means all health system requirements for entry are met by a given representative or individual.

Before creating a policy, understand the regulations

The first step to developing and implementing a quality vendor credentialing and badging program is understanding the rules, regulations, standards, and risks associated with noncompliance. Violations can lead to legal repercussions, including penalties and fines. A health system should work with its internal compliance and legal teams, as well as any other relevant parties, to determine how to draft policies. At a high level, to create a vendor credentialing compliance policy, first familiarize yourself with The Joint Commission standards. The Joint Commission expects health systems to know who is entering the facility—and for what reason—to help maintain a safe and secure environment.[1]

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However, it's important for health systems to remain nimble, as standards from regulatory bodies will evolve. For instance, the emergence of COVID-19 led to the creation of the Occupational Safety and Health Administration Emergency Temporary Standard that sought to protect healthcare workers during the pandemic. [2] Local, state, and national COVID-19 testing and vaccination mandates are also continuously shifting. Therefore, it's wise to dedicate resources to routinely review standards from regulatory bodies, including the Office of Inspector General, the Centers for Medicare & Medicaid Services, and the Office for Civil Rights.

Developing a badging policy

A badging policy provides guidelines to a system's facilities and staff members. The policy may be applied to acute care hospitals, non-acute hospitals, ambulatory surgery facilities, and office-based operating room settings that are a part of the health system.

The health and safety of everyone within a health system cannot be jeopardized by individuals who are able to bypass the credentialing system. For instance, some facilities allow a warning badge to be provided to an unregistered HCIR that has not met the health system's credentialing requirements, allowing them access to the facility. The best way to facilitate a safer, more secure environment is to institute initiatives to build a bridge to zero noncompliant badges.

But what does it mean for a health system to be fully badge-compliant? Each health system has its own badge rules and policies to help ensure that visitors and HCIRs entering their facilities are compliant with the health system's guidelines. In this case, the badge in question is a fully compliant badge—not a warning badge for unregistered vendors. Any HCIR possessing a fully compliant badge has met the health system's credentialing requirements. And generally, an HCIR's badge approval will require some form of background check, sanction check, verification of required training, approved immunization records, and proof of liability insurance, based on the health system's badging policy.

Yet many health systems fail to reach credentialing compliance goals, primarily because of insufficient investments and limited access to the right resources and education. In fact, in a 2020 survey, GHX data showed that 99% of health systems can improve their existing vendor credentialing compliance practices. To make these improvements, health systems must develop a robust badging program that closes existing gaps to noncompliant badges.

Committing to compliance

By following a process improvement methodology such as DMAIC (Define, Measure, Analyze, Improve, and Control), health systems can improve their vendor credentialing compliance program and help obtain the following benefits:

- Create safer, more secure environment for patients, staff, and visitors, knowing that HCIRs are credentialed;
- Reduce risk for quality and safety violations during on-site audits from accreditation and certification organizations like The Joint Commission and DNV;
- Help eliminate potential loopholes that could allow sign-in offenders to abuse a warning badge policy; and
- Gain greater visibility into a health system's vendor credentialing compliance program.

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To help maintain credentialing compliance, health systems must remember this is an ever-evolving process, not a set of boxes that only needs to be checked once. Health systems must maintain a proper cadence of reviewing its vendor credentialing compliance program to make sure they know who is walking through their halls, making an effort to regularly screen HCIRs and visitors. Health systems must also continue to assess their vendor credentialing compliance program and identify ways to make continuous improvements. When health systems understand that vendor credentialing is an iterative process, they can create a culture of compliance that leads to top-down educational strategies and structured methodologies that improve the safety of the health system.

Conclusion

For health systems across the nation, part of managing the reality of the ongoing COVID-19 pandemic and related considerations—from infection control to vaccination status to personnel management—is focusing on building a quality vendor credentialing program. Each HCIR that enters a facility should have a compliant badge. While this goal may seem like a Herculean task, it can be achieved by embracing technology, adhering to process improvement methodologies, and properly addressing constantly shifting standards. By keeping these considerations in mind, health systems are taking steps toward achieving a safer environment for patients, staff, vendors, and visitors.

Takeaways

- For health systems across the country, robust vendor credentialing and visitor management programs are more important than ever.
- Vendor credentialing compliance is not a new concept, but its importance has been brought to the forefront by COVID-19.
- Whether a health system has 25 healthcare industry representatives or 25,000, it is vital to institute a compliant badge rule for all badge holders.
- Health systems must remember maintaining credentialing compliance is an ever-evolving process.
- To remain compliant, it is crucial for health systems to adhere to constantly changing requirements from the Occupational Safety and Health Administration, Office of Inspector General, Centers for Medicare & Medicaid Services, and others.
- <u>1</u> Crisis Prevention Institute, The Joint Commission Comprehensive Accreditation Manual for Hospitals: Alignment to Crisis Prevention Institute, Inc. (CPI) training programs, 2021,
- $\underline{https://www.crisisprevention.com/CPI/media/Media/Resources/alignments/joint-commission-hospitals-alignment.pdf.}$
- <u>2</u> Occupational Exposure to COVID-19; Emergency Temporary Standard, 86 Fed. Reg. 32,376 (June 21, 2021). <u>3</u> GHX, "Expertly Navigate Healthcare Vendor Credentialing Compliance," accessed April 21, 2022, https://www.ghx.com/media/bzlluzij/ghx navigate-vendor-credentialing-compliance infographic.pdf.

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