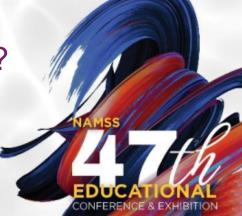


Be CarefulWhat You Wish For

Are You Ready to Navigate
Potentially Troubled Waters
of a 3-Year Reappointment Cycle?





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FORMERLY KNOWN AS THE GREELEY COMPANY



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FORMERLY KNOWN AS THE GREELEY COMPANY

Disclosure Statement

Sally Pelletier and Mary Hoppa have no financial relationships to disclose.



Learning Objectives

At the end of this session, participants will be able to:



DETERMINE

if they can move to
a 3-year reappointment cycle,
and what needs to be done to
be compliant.



IDENTIFY

the credentialing and privileging process changes and transition plan that must occur to facilitate this change.



IDENTIFY

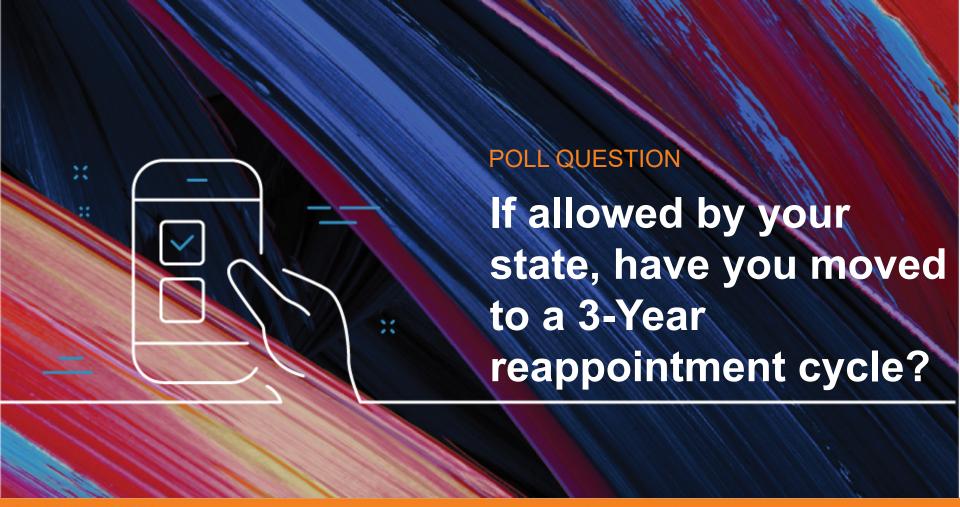
whether they need to assess their peer review process to ensure that it is robust enough to identify competency concerns and remediate them between the lengthier reappointment cycles.



Benefits
of a 3-Year
Reappointment
Cycle







Is There a
Downside
to a 3-Year
Reappointment
Cycle?



The Law of Unintended Consequences

CAN YOU Move to a 3-Year Reappointment Cycle?



CMS mandates a periodic reappraisal every 24 months.

Interpretive Guidelines §482.22(a)(1) The medical staff must at regular intervals appraise the qualifications of all practitioners appointed to the medical staff/granted medical staff privileges. In the absence of a State law that establishes a timeframe for periodic reappraisal, a hospital's medical staff must conduct a periodic appraisal of each practitioner. CMS recommends that an appraisal be conducted at least every 24 months for each practitioner.

Interpretive Guidelines §482.51(a)(4) Surgical privileges should be reviewed and updated at least every 2 years.

CAN YOU Move to a 3-Year Reappointment Cycle?









What do the accreditors say?

Does your state have any prohibitions on a 3-year reappointment cycle?

If you are a system, do some states allow it and others don't?
What to do?

Do you have any internal prohibitions on a 3-year reappointment cycle, such as your bylaws?

SHOULD YOU Move to a 3-Year Reappointment Cycle?

Do bylaws changes need to be made?

Credentialing and privileging caveats

Do bylaws changes need to be made?

Bylaws Changes

- Change needed to go from a 2-year to a 3-year reappointment cycle
- Is this the time to address other changes?

Credentialing and privileging caveats

Credentialing and Privileging Caveats

Do bylaws changes need to be made?

Effective Date

- Three-year appointments are applicable to new applicants
- Current appointees will transition to three-years once they are reappointed
 - Make sure current appointments do not exceed two years
 - Is this a good time to balance the workload?
 - System considerations Is this the time to get your reappointments in sync?

Credentialing and privileging caveats



Credentialing and Privileging Caveats

- Do your privileging forms reflect activity for a 2-year timeframe?
 - Pros and cons of adjusting to a longer timeframe
 - Is this the time to update your DOPs?
- Do you work with a CVO? Do you need to make changes to the service agreement to reflect a 3-year reappointment cycle?

Do bylaws changes need to be made?

Credentialing and privileging caveats

Credentialing and Privileging Caveats

- NPDB query must be every two years.
 Use Continuous Query to avoid mishaps.
- Forms, letters, reference questionnaires
- Dues / Fees
- Telemedicine agreements
- Assess impact on delegation agreements / processes

Do bylaws changes need to be made?

Credentialing and privileging caveats

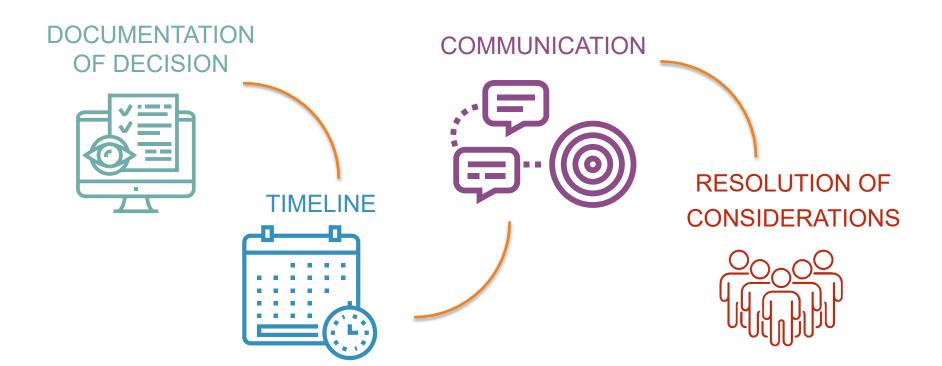
Peer Review Changes

- Less frequent comprehensive review (reappointment)
- Need for more robust interim performance measurement
- May need readjustment of OPPE review cycles to correlate with new reappointment timeframes
- Is this the time to update your peer review process?

Do bylaws changes need to be made?

Do your privileging forms/criteria need to be changed?

TRANSITION PLAN



Summary

Review your state laws and regulations (leverage your legal team!) Educate
yourself, your
team, medical
staff leaders,
and C-suite
executives

Assess implications on bylaws, privileging criteria, and OPPE

Create a ramification summary to help gain support

Communicate, collaborate, and consult with colleagues and other industry



Questions

