

The Who, What,  
When and Why  
of  
Background Investigations  
and Credentialing

**Presented by: Rhonda Jackson  
Reality Check Screening, LLC**

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Because the person you  
hire today....



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May not be who shows up  
to work the next...



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## WHY ?

- First and foremost -- If you are a FQHC – EVERYONE should be credentialed according to The Joint Commission standards. You make take the following into consideration when determining how in-depth the background investigation should be:
  - What would it cost you both personally and professionally to bring in the wrong candidate?
  - If the candidate is presented by a recruiting firm, what type of pre-screening are they providing? Are they willing to reimburse you for a candidate that you are unable to hire?
  - Are you willing to invest the time and money required to bring in a candidate that could harm the reputation of your facility?

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## Why...Top 5 Reasons

- Ensures a successful match
- Reduces turnover
- Reduces the risk of negligent hires
- Improves the quality of the medical staff
- Provides protection for patients and employees

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## WHO ?

- Again, from a credentialing standpoint, EVERYONE must go through the process. You may use the following in determining the extent to which additional background information may be obtained:
  - Is this a new graduate or a practicing candidate?
  - Is this a candidate that is new to the area? Contacts -- Who do you know that knows them? (...and how long has it been since they've been in contact?!)
    - Has the candidate moved around a lot? Are there unexplained gaps in the CV?
    - Has the candidate been "forthright" with information, but seems over eager to make a decision?

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## Red Flags

- Financial problems
- Multiple practices
- Multiple locations during solo practice
- Suspicious time intervals
- Lack of Board Certification
- Previous broken contracts
- Unwillingness to sign authorization and release
- Lapse in licensure
- Undue anxiety about licensing/malpractice

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## WHEN ?

- What costs are involved in the initial recruitment process (i.e.: personnel costs, advertising, databases, mailings, recruiting firms)?
- What time and costs are involved in the site visit(s)?
- AGAIN -- Is this a candidate that is new to the area? Contacts -- Who do you know that knows them?

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## Forms Needed to Gather Information

1. **Authorization/release** form to conduct background checks.
2. **Attestation and disclosure** form to cover past issues of sanctions, lawsuits, convictions.
3. **Employment application** to verify education, licensure, work history, disciplinary actions.

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## WHAT ?

- Do you have a clear-cut procedure for pre-screening candidates and are you comfortable with the requirements?
- What is required for malpractice coverage – in other words, will you be able to obtain coverage for the physician?
- Do you have procedures in place to provide adequate documentation of due diligence?
- Do you have procedures in place for the acquisition of records and the confidential storage thereof?

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## Differences in Credentialing Reports Versus Background Investigations

### Credentialing/Privileging Reports Include:

- Undergraduate through Professional Degrees
- Training Programs (Internship, Residencies, and Fellowships)
- Complete Licensure Verifications
- Staff Affiliations or Employment Verifications
- Professional Referencing
- Drug Enforcement Agency Registration
- Board Certification
- Office of Inspector General Exclusions (Medicare/Medicaid)
- GSA Excluded Providers List
- Malpractice Coverage / Claim History
- National Practitioner Data Bank

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## AMA/AOA Profiles

- Medical School Information
- Residency Information
- Educational Commission for Foreign Medical Graduates (ECFMG)
- Board Certification
- Current State Licensure
- DEA Registration
- Medicare/Medicaid Sanctions
- Online service: \$35 (M.D. Same Day)  
\$22 (P.A. Same Day)  
\$13 (D.O. Same Day)

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In addition to information included in the credentialing process, background investigations will include the following:

- **Social Security Trace/Validation and Alias Name Search and Address Verification**
- **County Level Civil and Criminal Court Records**
- **Federal Civil, Criminal and Bankruptcy Records**
- **Statewide Criminal Record Searches**
- **National Sex Offender Registry Search Records**
- **Driving Record History**
- **Employment Credit Profile**
- **Proprietary Databases, such as a Multi-state Criminal Database Search**

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What type of information is included in the "background process" ?

- County Level Civil and Criminal Court Records**
- Civil – This may be the MOST important part of the background. Civil Actions include Malpractice Actions (All open/pending or closed), Breach of Contract Actions, Discrimination suits, etc.).
  - Criminal – Any misdemeanor and felony criminal actions, including some traffic violations such as Driving Under the Influence.
- Federal Civil, Criminal and Bankruptcy Records**
- Has your candidate worked for a Federal or State Governmental Agency? This would include any type of State Collegiate Facility. Civil cases in this situation would most generally be filed in the Federal Court rather than the County Court. An example of a Federal Criminal Action might be Racketeering. Bankruptcy Records may often tell a tale of other problem areas for a candidate.
- Statewide Criminal Record Searches**
- Will provide information on misdemeanor and felony criminal CONVICTIONS throughout a state. Reported by various municipalities and county jurisdictions.

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What type of information is included in the "background process" ? – Cont'd...

- National Sex Offender Registry Search Records**
- Includes all 50 states, Puerto Rico, Guam and all participating tribes.
- Driving Record History**
- Most importantly – Driving Under the Influence of Alcohol; however, it also provides repeat offender information, and may include additional aliases or areas of residence.
- Employment Credit Profile**
- Includes address and alias information, Collections, Federal and State Tax Liens, Student Loan Information
- Proprietary Databases, such as a Multi-state Criminal Database Search**
- A good catch-all, investigative source comprised of information contained throughout various county, state and federal criminal sites.

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The Top 5 reasons for conducting a background investigation and/or utilizing the service of a Credentials Verification Organization (CVO) or Consumer Reporting Agency (CRA)

1. Conducting a background investigation enables you to obtain a clear picture of your candidate and if there are issues that may need to be addressed PRIOR TO the credentialing process.
2. All information gathered through primary source verifications in the background investigation is appropriate for use in the credentialing process; thereby shortening the amount of time to change your recruit from a candidate to a staff member.
3. CRA's and CVO's are held to strict compliance regulations through the Fair Credit Reporting Act, including how the information is obtained, confidentiality issues, and storage of records.
4. If you do not have someone on your staff dedicated to the screening/credentialing process, a reputable CRA or CVO will know where to obtain the required information in the most efficient and timely manner.
5. Utilizing a CRA or CVO to process these reports provides an un-biased third-party look at the candidate.

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The Joint Commission Principles for CVO's

**\*\*Any organization may use the services of a credentials verification organization (CVO). While using such agencies may relieve the organization from the process of gathering the information, it does not relieve the organization from the responsibility of having complete and accurate information. An organization that bases its decisions in part on information obtained from a CVO should achieve a level of confidence in the information provided by the CVO, by evaluating the following:**

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TJC Principles for CVO's  
Cont'd

- The CVO makes known to the user what data and information it can provide.
- The CVO provides documentation to the user describing how its data collection, information development and verification process(es) are performed.
- The user is provided with sufficient, clear information on database functions that includes any limitations of information available from the CVO, the time frame for CVO responses to requests for information; and a summary overview of quality control processes related to data integrity, security, transmission accuracy, and technical specifications.
- The user can easily discern which information, transmitted by the CVO, is from a primary source and what is not.
- For information transmitted by the CVO that can go out of date, the date the information was last updated from the primary source is provided by the CVO.
- The user can discern whether the information transmitted by the CVO from a primary source is all the primary source information in the CVO's possession pertinent to a given item or, if not, where additional information can be obtained.
- The user can engage the quality control processes of the CVO when necessary to resolve concerns about transmission errors, inconsistencies, or other data issues that may be identified from time to time.

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### Pre-Screening Sites

- **State Licensing Boards:**  
Of course you can contact each of them individually or you can utilize the AIM Docboard site which has several of the state boards as members and also provides you with links to many of the other sites: <http://www.docboard.org/docfinder.html>
- **Medicare/Medicaid Fraud – OIG** <http://exclusions.oig.hhs.gov/>  
This site is pretty straight forward but only provides information on current exclusions.
- **DEA Registration** <http://www.deanumber.com/>  
This is a pay-per-use system or you can pay a yearly fee. Prices range from approximately \$10 per query to \$2400 per year for a single user.
- **American Board of Medical Specialties** <http://www.boardcertifieddocs.com>  
This is the official directory for all of the Allopathic American Boards and is updated at least twice a year. All Osteopathic physician verifications may be made through the AOA at [https://www.doprofiles.org/sign\\_in.cfm](https://www.doprofiles.org/sign_in.cfm)
- **Fraud and Abuse Control Information System (FACIS)** <https://www.verisvs.com>  
This is a good catch-all site, and is good for a quick screen and includes the OFAC (Office of Foreign Assets Control) search.
- **General Services Administration (Excluded Parties List)** <http://www.epls.gov/>  
This World Wide Web site is provided as a public service by General Services Administration (GSA) for the purpose of efficiently and conveniently disseminating information on parties that are excluded from receiving Federal contracts, certain subcontracts, and certain Federal financial and non-financial assistance and benefits, pursuant to the provisions of 31 U.S.C. 6101, note, E.O. 12549, E.O. 12689, 48 CFR 9.404, and each agency's codification of the Common Rule for Non-procurement suspension and debarment.

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### Questions ?

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