



## Provider and Central Verification Organization (PCVO)

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NEW 10-2005  
PREVIOUS REVISION 05-2019, 06-2020  
REVISED 05-2019. REVIEWED; 6-3-30

## PCVO Policy 18: Corrective Action

### 1.0 SCOPE

- 1.1 This policy applies to physicians and other practitioners who are eligible for credentialing and recredentialing by the University Hospitals ('UH') Provider and Central Verification Organization ('PCVO') and for whom PCVO provides delegated credentialing services pursuant to a delegated agreement with payor(s), and who may be a member of UH-affiliated practice group(s) and/or an individual practitioner.
- 1.2 This policy does not apply to practitioners who seek appointment to membership on, are current members of, who seek to be privileged by, or who are currently privileged by the University Hospitals Cleveland Medical Center and/or University Hospitals Rainbow Babies and Children's Hospital Medical Staff. (Please refer to PCVO Policy 2: Sister to Sister Relationships: Functions Performed by UHCMC and/or UHRB&C for PCVO; UHCMC and/or UHRB&C Medical Staff Bylaws; and UHCMC and/or UHRB&C Medical Staff Rules and Regulations for these practitioners.)

### 2.0 DEFINITIONS

- 2.1 Corrective action: Action taken by the PCVO to alter a practitioner's participation for quality reasons.
- 2.2 Participation: The practitioner's association, membership, relationship, privileges or credentialing status with the UH PCVO.

### 3.0 POLICY

- 3.1 When PCVO takes action to alter a practitioner's participation, relationship or credentialing status for quality reasons, PCVO:
  - 3.1.1 Reports actions to the appropriate authorities, according to Federal and Ohio law, and any other regulatory requirements. Refer to PCVO Policy 20: Notification to Authorities.
  - 3.1.2 Provides the practitioner with due process that meets at minimum the requirements of the Health Care Quality Improvement Act of 1986 (HCQIA). Refer to PCVO Policy 19: Appeals Process.

### 4.0 PROCEDURE

- 4.1 The PCVO Credentialing Committee, in the performance of its peer review function, has the authority to evaluate practitioner credentials and peer review data and to make recommendations regarding approval, denial, suspension, limitation, revocation, or termination of practitioner participation. Refer to PCVO Policy 11: PCVO Credentialing Committee.

4.2 Range of Actions. The range of actions that may be taken by the PCVO include:

4.2.1 Automatic Suspension and/or Revocation of Participation

4.2.1.1 Automatic Suspension Grounds

4.2.1.1.1 License. Practitioner's license, registration, or certification to practice his/her profession in the State of Ohio is suspended or otherwise limited in any way, or if a practitioner's respective licensing board materially limits the practitioner's authority to practice without actually restricting or limiting the member's license, registration, or certification, or he/she fails to renew such license, registration, or certification.

4.2.1.1.2 DEA Registration / Federal or State Exclusion. Suspension, voluntary relinquishment of, agreement with a governmental entity not to exercise a license or permit to prescribe narcotics, or notice of exclusion/debarment from participation in the Medicare, Medicaid or other federal or state health care program. This Section does not apply to the lapse of a narcotics license or permit under circumstances where the practitioner is not required by law to hold a license or permit, and the practitioner was not under investigation for violation of the law.

4.2.1.1.3 Professional Liability Insurance Coverage. Failure to provide satisfactory evidence of current professional liability insurance coverage in accordance with PCVO policy.

4.2.1.1.4 UH Corporate Compliance Programs. Failure to comply with the training and reporting requirements of any UH or PCVO Corporate Compliance Program or Policy.

4.2.1.2 Automatic Suspension Process

4.2.1.2.1 The practitioner immediately notifies the PCVO Medical Director and UH Medical Staff Services and Credentialing staff of the occurrence of any of the situations set forth in Section 4.2.1.1, who reports such occurrence to the PCVO Credentialing Committee.

4.2.1.2.2 The automatic suspension for the occurrence of any of the situations set forth in Section 4.2.1.1 is considered final without a right to hearing or further review. Suspension is for the time in which it takes the practitioner to demonstrate evidence reasonably satisfactory to the PCVO Credentialing Committee of his/her compliance with the stated requirements, not to exceed thirty (30) days. Noncompliance at the end of thirty (30) days is

construed as voluntary resignation of participation on the practitioner's behalf.

#### 4.2.1.3 Automatic Revocation Grounds

4.2.1.3.1 License: Practitioner's license, registration, or certification to practice his/her profession in the State of Ohio is revoked.

4.2.1.3.2 Conviction of a Felony: Practitioner is convicted of or pleads guilty to a felony in any court in the United States, either federal or state.

#### 4.2.1.4 Automatic Revocation Process

4.2.1.4.1 The practitioner immediately notifies the PCVO Medical Director and UH Medical Staff Services and Credentialing staff of the occurrence of any of the situations set forth in Section 4.2.1.3, who reports such occurrence to the PCVO Credentialing Committee.

4.2.1.4.2 The automatic revocation of participation for the occurrence of any of the situations set forth in Section 4.2.1.3 is considered final without a right to hearing or further review, and is construed as voluntary resignation of participation on the practitioner's behalf.

#### 4.2.2 Summary Suspension of Participation

4.2.2.1 Whenever a practitioner's conduct presents a danger of immediate and serious harm to the life, health or safety of any patient or other individual, or when a practitioner's conduct willfully disregards or grossly violates these PCVO Policies or UH Policies, the PCVO Medical Director or PCVO Board of Directors has the authority to suspend summarily the participation of such practitioner. Such summary suspension becomes effective immediately upon imposition, and the PCVO Medical Director promptly gives notice of the suspension to the practitioner, and notice to the PCVO Board.

4.2.2.2 As soon as reasonably possible after such summary suspension, a meeting of the PCVO Credentialing Committee is convened to review and consider the action taken. The PCVO Credentialing Committee recommends to the PCVO Board modification, continuation, or termination of the terms of the summary suspension, and provides notice of such recommendation to the practitioner.

4.2.2.3 Upon receiving notice of an adverse recommendation by the PCVO Credentialing Committee, the practitioner is entitled to the procedural rights as provided in the PCVO Policy 19: Appeals Process.

4.2.2.4 The terms of the summary suspension as sustained by the PCVO Credentialing Committee remains in effect pending a final decision by the PCVO Board of Directors.

#### 4.2.3 Corrective Action

4.2.3.1 Cause: The PCVO Board may initiate corrective action against a practitioner whenever the activities or professional conduct of any practitioner are believed to be detrimental to patient safety or inconsistent with the efficient delivery of patient care at the generally recognized professional level of quality, or are reasonably probable of being disruptive to PCVO operations, or are reasonably probable of being in violation of PCVO policies or UH policies. Initiation of corrective action does not preclude imposition of summary suspension, nor does it require the prior imposition of such a suspension.

#### 4.2.3.2 Process:

4.2.3.2.1 Any individual may provide information pertaining to a practitioner's conduct, performance or competence. Such information may be provided to the PCVO Medical Director or to any other member of the PCVO Credentialing Committee. Any proposal for corrective action is in writing, supported by a detailed description of the specific conduct, activity, or non-performance that constitutes the grounds for a request, and is submitted to the PCVO Medical Director.

4.2.3.2.2 The PCVO Medical Director reviews the request for corrective action and conducts his or her own initial investigation of the facts surrounding the proposal (including contacting the affected practitioner). If the PCVO Medical Director does not believe that the facts and circumstances warrant further inquiry or corrective action, he/she may either pursue a resolution with the practitioner outside of the formal corrective action process or terminate the inquiry. In any event, the PCVO Medical Director will report his/her decision to the PCVO Board of Directors.

4.2.3.2.3 If the information provided to or discovered by the PCVO Medical Director would indicate to a reasonable person that further, formal inquiry is warranted, he/she refers the matter to the PCVO Credentialing Committee for its review and further action. During this process, the affected practitioner's participation status continues until final decision is reached by the PCVO Board of Directors.

4.2.3.2.4 Within a reasonable time following the referral by the PCVO Medical Director, the PCVO Credentialing Committee shall conduct its own investigation of the applicable facts. This investigation is conducted in a reasonable, good faith manner, and includes written notice of the investigation to the affected practitioner.

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- 4.2.3.2.5 The affected practitioner is entitled to submit a written statement of his or her position regarding the investigation to the PCVO Credentialing Committee.
- 4.2.3.2.6 Upon completion of its investigation, the PCVO Credentialing Committee makes a written recommendation to the PCVO Board of Directors including the facts and premises underlying the recommendation, and provides a copy of its recommendation to the affected practitioner (which constitutes notice of the practitioner's right to request the procedural rights provided in PCVO Policy 19: Appeals Process).
- 4.2.3.2.7 Upon receipt of the recommendation of the PCVO Credentialing Committee, and where the practitioner does not request an appeal, the PCVO Board of Directors may accept, reject or modify the recommendation of the PCVO Credentialing Committee. In such instances the PCVO Board of Director's decision is final and practitioner will have no right to appeal such decision.
- 4.2.3.3 Any action by the PCVO Credentialing Committee pursuant to this section on Corrective Action or any combination of such actions entitles the practitioner member to the procedural rights as provided in the PCVO Policy 19: Appeals Process.
- 4.2.4 **Continuity of Patient Care.** Upon the imposition of summary suspension or the occurrence of an automatic suspension, the practitioner provides for alternative coverage of his/her patients.
- 4.2.5 **Status of Participation.** Except in the case of a summary suspension or automatic suspension and revocation under this Policy, any corrective action against a practitioner does not become effective in the event that such practitioner makes a written request for a hearing according to PCVO Policy 19: Appeals Process.
- 4.3 **Advising Practitioners of Corrective Actions and Appeal Process**
- 4.3.1 Practitioners are given a copy of applicable PCVO credentialing policies, including this PCVO Policy 18: Corrective Action and PCVO Policy 19: Appeals Process with their initial credentialing application packet. Material revisions to the policy are distributed to PCVO participating practitioners.

**5.0 ATTACHMENTS**

- 5.1 None




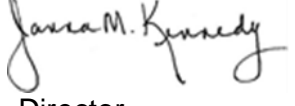
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**6.0 SEE ALSO**

- 6.1 PCVO Policy 2: Sister to Sister Relationships: Functions Performed by UHCMC and/or UHRB&C for PCVO.
- 6.2 PCVO Policy 11: PCVO Credentialing Committee
- 6.3 PCVO Policy 18: Corrective Action
- 6.4 PCVO Policy 19: Appeals Process
- 6.5 PCVO Policy 20: Notification to Authorities
- 6.6 UHCMC and/or UHRB&C Medical Staff Bylaws
- 6.7 UHCMC and/or UHRB&C Medical Staff Rules and Regulations

<b>APPROVALS</b>	
 Medical Director PCVO 6-3-2020	 Director UH Medical Staff Services and Credentialing 6-3-2020