



EHNAC

Accreditation
Guidelines

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We, at EHNAC, believe that through successful completion of the accreditation process, organizations can more efficiently implement best practices, improve performance and comply with industry legislative mandates and standards.

These guidelines are intended to answer any questions you have on becoming accredited, including accreditation types, the denials process, modifications, appeals and late penalties.

If you would like additional information on the topics discussed below, please visit [EHNAC](#), and/or send any questions or comments to info@ehnac.org or call 860-408-1620.

The Accreditation Process

Both first time applicants and re-accreditation candidates will follow the same process for achieving accreditation.

Application Process

Organizations interested in knowing if they qualify for EHNAC accreditation must complete the - application on the EHNAC Web site.

An [Applicant Agreement](#) document and a [Sentinel Events](#) document must both be signed by the applicant and submitted via the “Log an Application” portal.

A financial statement to verify your organization’s revenue must also be submitted. Examples of a suitable financial statement include a signed attestation from your accountant or CFO, a tax return or an Annual Report. Organizations that state that they are at the highest revenue level do not need to submit this document for validation.

Summary of the Accreditation Process

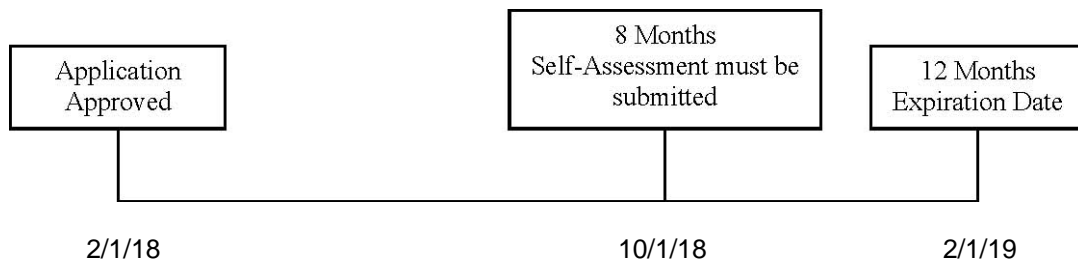
1. Application Process:
 - a. Complete the electronic [Application](#) on the EHNAC website.
 - b. A clarification letter is emailed to gather any required information.
 - c. A detailed letter is emailed to the organization with the complete instructions on the application process.
 - d. Log into the “Log an Application” portal and upload the signed Applicant Agreement, Sentinel Events document, and revenue verification in PDF format or fax to (860) 760-6630.
 - e. Mail payment of applicable application fees [Annual Fee, Multiple Program & Site Visit Fee(s)] to EHNAC.
2. Upon completion of the Application Process and approval, the EHNAC Self-Assessment zip file will be made available to the organization, the Site Reviewer will be assigned and they will be added to the EHNAC website [Accreditation Status](#) page as a Candidate.
3. Submit complete Self-Assessment via EHNAC Self-assessment portal **4 months prior to the expiration date**. New applicants can submit the Self-assessment as soon as it is completed before the due date.
4. If the Self-Assessment contains sufficient satisfactory information and documentation a site visit(s) will be scheduled to verify the information contained in the Self-Assessment. If the assigned site reviewer has questions or do not feel it is complete, it may request the Self-Assessment be resubmitted before a date is set for the site visit(s).
5. Site visits are completed, and the Site Reviewer completes the Site Visit Report.
6. Mail payment of the site visit expense fee to EHNAC.
7. Applicant organization approves Site Visit Report.
8. The Commission reviews and votes on the Site Visit Report.
9. The organization will be informed whether the accreditation has been approved or denied.
10. Upon approval of accreditation and payment of all fees the organization’s status is changed to Accredited on the EHNAC website [Accreditation Status](#) page.

Re-Accreditation:

Occurs every two years from the date the candidate is accredited and is the same process which is followed for Accreditation. (see Accreditation) This includes submitting an application and satisfactorily completing the application process and is based upon information disclosed in which the pricing and/or number of physical site reviews may be revised accordingly.

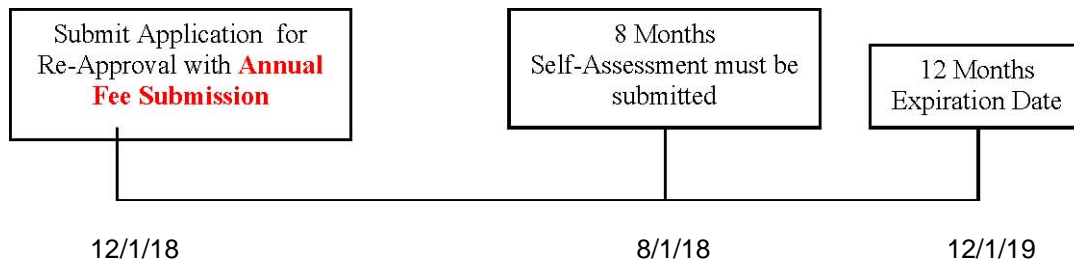
Sample Accreditation Timeline

First Time Applicant



If Accreditation is achieved 12/1/18 this becomes the Accreditation Date. Annual Fee is then due each year by this date. Accreditation expiration date would be 12/1/20. Next Self-assessment would be due 8/1/20.

Re-Applicant



The Annual Fee could be submitted without the Re-application at that time but most organizations need several months to prepare the Self-assessment. In any case, the Self-assessment is due 8 months from the Annual Fee due date.

Accreditation Fees

How to determine an Organization's Fee Category

Organization fees are based on revenue.

This revenue from an organization is defined as any services performed either electronically or paper-based that supports the program. This includes all electronic transactions, patient statements, customer service, infrastructure, technical performance, business practices, privacy, security and confidentiality resources.

The revenue from banking organizations is based on the size of their treasury management operations handling the healthcare services business line. Healthcare trading partners include such entities as providers (such as physicians and hospitals), labs and ancillary professionals, payers, medical supplies/distributors and pharmaceuticals.

NOTE: Six months of operating revenue must be provided to be considered for accreditation.

Fee Schedule

| | Size | Revenue Amount | Annual Fee | Site Visit Fee/ Site/ Day [HISP P&S] | DTAAP-CA & RA, PMS & EPCS SV Fee/Site | Multiple Program Fee |
|---|-----------------------------|---------------------------------------|------------|--|---|-------------------------|
| 1 | Very Small | Under \$3M | \$3,250 | \$4,000 | \$6,000 | \$1,625 |
| 2 | Small & OSAP Programs | Greater Than \$3 Less Than \$8M | \$4,250 | \$4,000 | \$6,000 | \$2,125 |
| 3 | Medium | Greater Than \$8 Less Than \$20M | \$8,500 | \$7,000 | \$9,000 | \$4,250 |
| 4 | Med/Large | Greater Than \$20 Less Than \$50M | \$13,000 | \$7,000 | \$9,000 | \$6,500 |
| 5 | Large | Greater Than \$50M Less Than \$75M | \$20,000 | \$7,000 | \$9,000 | \$10,000 |
| 6 | Very Large | Greater Than \$75M | \$26,500 | \$7,000 | \$9,000 | \$13,250 |

Note – Federal, state non-profit organizations are included in the Small Size above.

Each site visit is considered one day.

Annual Fee

For Accredited organizations, the Annual Fee is due every year prior to the anniversary of the accreditation date. For new organizations, this is paid as part of the applicant process.

Multiple Program Fee

The Multiple Program Fee occurs when an organization applies for accreditation in more than one program. The Multiple Program Fee applies to all programs applied for and is based on the organization's combined program revenues. This fee is paid like the site visit on the accreditation year.

Outsourced Program

The Annual Fee is \$3,500 per organization regardless of revenue. The Site Visit Fee is \$3,750 per site regardless of the revenue.

Site Visit Fees for DTAAP, PMSAP, CEAP & EPCS

If multiple programs are applied for and one of the programs is DTAAP, PMSAP, CEAP, or EPCS, an additional site visit day is required even if the location of the site visit is the same.

Site Visit Fees for Sites Outside the US

Site Visit Fees for sites that are outside the US are \$4,000 per day in addition to the standard Site Visit per day Fees (plus travel expenses).

Re-accreditation Fees

The fees are the same for each accreditation. The Annual Fee is paid each year and all other fees are paid every other year on the accreditation year.

CAQH CORE, HBMA & DirectTrust.org members Discount

CORE certified entities, HBMA members and DirectTrust.org members can take advantage of a one-time discount. For CORE this applies to CORE Phase I and/or Phase II certified entities. The partnership program discount is \$400 for organizations with annual revenue below \$75 million, and \$600 for organizations with annual revenue above \$75 million. The entity will indicate that it is CORE certified or an HBMA or DirectTrust.org member when submitting its application. View <http://www.caqh.org> for more information about CORE certification.

Accredited Organizations Adding New Programs between Accreditation Cycles

If an accredited organization indicates a desire to add an additional [secondary] program [other than DTAAP, CEAP, PMSAP and EPCS] between accreditation cycles, and has the same sites to review, the Multiple Program Fee will apply, and a \$2,000 Desk Review fee is also assessed. If there are additional sites to review, then the applicable Site Visit Fee and associated travel expense costs apply.

If an accredited organization adds either DTAAP, CEAP, PMSAP and/or EPCS between their accreditation cycles, a Site Visit would be required to review the additional material that will be submitted in the Self-assessment. See Site Visit Fee information in the Accreditation Guidelines below.

If the new program was added prior to the 1-year anniversary, then it was included in present/current accreditation. If the new program is added post the 1-year anniversary then the candidate is accredited and bypasses the next accreditation cycle, unless there are changes. This does not, however, apply to DTAAP, PMSAP and EPCS where the accreditation cycle cannot exceed 2 years.

Example if the accreditation date is 6/1/16 and the new program is added before 6/1/17 it will be incorporated into the current [2016] accreditation cycle and be included in the next [2018] accreditation. If the new program is added after 6/1/17 only changes will need to be reported during the next [2018] accreditation and it will be incorporated into the following [2020] accreditation cycle.

Summary of the Adding Multiple Program Process

1. Application Process:
 - a. Complete the electronic [Application](#) on the EHNAC website.
 - b. Mail payment of applicable fees [Multiple Program, Site Visit Fee(s), Desk Review] to EHNAC.
2. Upon completion of the Application Process and approval, the EHNAC Self-Assessment zip file will be made available to the organization, the Site Reviewer will be assigned and they will be added to the EHNAC website [Accreditation Status](#) page as a Candidate.
3. Submit complete Self-Assessment via EHNAC Self-assessment portal **4 months prior to the expiration date**. New applicants can submit the Self-assessment as soon as it is completed before the due date.
4. If the Self-Assessment contains sufficient satisfactory information, either a Site Visit(s) or a desk review will be scheduled to verify the information contained in the Self-Assessment. If the assigned site reviewer has questions or do not feel it is complete, it may request the Self-Assessment be resubmitted before a date is set for the site visit(s).
5. If applicable Site Visits are completed and the Site Reviewer completes the Site Visit Report.
6. If applicable Mail payment of the Site Visit Expense Fee to EHNAC.
7. Applicant organization approves Site Visit Report.
8. The Commission reviews and votes on the Site Visit Report.
9. The organization will be informed whether the accreditation has been approved or denied.
10. Upon approval of accreditation the organization's status is added to the EHNAC website [Accreditation Status](#) page.

Site Visit Fees

The Site Visit Fee is charged for each site reviewed. The Site Visit Fee is based on a per day fee for all programs.

The Site Visit Fees for the DTAAP, PMSAP and EPCS programs program are listed separately.

For financial organizations with multiple lockbox facilities and for OSAP applicants that have sites that perform the same function, and which demonstrate adherence to the same policies and procedures, a site visit rotation will be used to accredit the candidate as shown in the following table. **NOTE: This table provides guidelines only, as the number of sites requiring a visit may be increased based on such factors as newly acquired sites, sites that do not currently comply with standard policies and procedures, or other factors where additional visits are determined to be required.**

| No. of Sites | Site Visits Required | No. of Sites | Site Visits Required | No. of Sites | Site Visits Required | No. of Sites | Site Visits Required |
|--------------|----------------------|--------------|----------------------|--------------|----------------------|--------------|----------------------|
| 1 | 1 | 11 | 4 | 21 | 6 | 31 | 7 |
| 2 | 2 | 12 | 4 | 22 | 6 | 32 | 7 |
| 3 | 2 | 13 | 4 | 23 | 6 | 33 | 7 |
| 4 | 2 | 14 | 5 | 24 | 6 | 34 | 7 |
| 5 | 3 | 15 | 5 | 25 | 6 | 35 | 8 |
| 6 | 3 | 16 | 5 | 26 | 6 | 36 | 8 |
| 7 | 3 | 17 | 5 | 27 | 7 | 37 | 8 |
| 8 | 3 | 18 | 5 | 28 | 7 | 38 | 8 |
| 9 | 4 | 19 | 5 | 29 | 7 | 39 | 8 |
| 10 | 4 | 20 | 6 | 30 | 7 | 40 | 8 |

Travel expenses are not included and will be invoiced after the site visit(s).

In addition to the Site Visit Fee, when a self-assessment process requires subsequent resubmissions of the documentation to meet the criteria after the site visit is completed, there will be a charge of \$200/hour for the site reviewer time per additional submission of documentation.

Re-accreditation Fees

The fees are the same for each accreditation. The Annual Fee is paid each year and all other fees are paid every other year on the accreditation year.

Submission Requirements

Applicant organizations must submit:

1. Annual and Site Visit Fees - (mailed)
2. Signed Applicant Agreement - (Uploaded to the EHNAC “Log an Application” portal or faxed to 860-760-6630)
3. Signed Sentinel Events - (Uploaded to the EHNAC “Log an Application” portal or faxed to 860-760-6630)
4. Verification statement of organization’s revenue related to the program they are applying for - (Uploaded to the EHNAC “Log an Application” portal or faxed to 860-760-6630)

Upon receipt of all the above items, EHNAC will then review the documents to determine if the Applicant is accepted by EHNAC for accreditation processing and further review by the Commission.

Application acceptance

An organization must be established and be able to submit 6 months of operating income and production data related to the criteria in order to become accredited. An organization can apply and obtain Candidate Status however must have 6 months of operating income and production data related to the criteria before the Self-assessment can be submitted. The Self-assessment is submitted within 8 months of the application approval process so this does allow the timeframe to have the data.

When the applicant completes the application process, the applicant is awarded Candidate Status. If the application is not approved, the application fees are returned (less a processing charge of \$500). If the candidate withdraws from the accreditation program after three months from the date of EHNAC approval, no funds paid as part of the application process will be refunded to the candidate. *NOTE: The candidate must formally notify EHNAC prior to three months from acceptance date to receive a refund, (less the \$500 processing charge).*

EHNAC Self-Assessment zip file is made available to candidate. This contains all of the instructions and documentation needed to complete the Self-Assessment Report. *(If this is a reaccreditation submission, assure that any previous recommendations made in the final report are addressed as well)*

EHNAC will review the Self-Assessment Report to determine if it has been satisfactorily completed and is supported by the required evidentiary documentation. If this is a reaccreditation submission, assure that any previous recommendations are also addressed along with any evidentiary documentation as well. Once EHNAC has accepted the candidate’s Self-Assessment Report, EHNAC will contact the candidate to schedule a date for an EHNAC site review to verify compliance with the information reported. If the site reviewer has questions concerning the Self-Assessment Report, they may return it to the applicant for further information, documentation and clarification before a date is scheduled for the site review.

An invoice will be sent for the expenses after the EHNAC site review is completed. Accreditation will not be granted until this fee is paid. All outstanding fees must be paid prior to Accreditation being awarded.

Following the EHNAC site review, the site reviewer will complete a report and make recommendations to the Commission. A copy of the report is sent by the site reviewer to the candidate for verification of the factual data. The candidate’s Self-Assessment Report is submitted to the Commissioners who will make an accreditation determination by electronic balloting to:

- Award Full Accreditation;
- Award Provisional Accreditation; or
- Deny Accreditation.

Late & Incomplete Submissions

The complete Self-Assessment Report must be submitted 4 months prior to expiration. A complete report is in the specified structure with working Hyperlinks and provides sufficient evidentiary documentation. This allows time for review, revisions, a site visit(s) and appeals. This also prevents a gap in the accreditation or re-accreditation process. Re-accreditation Self-Assessments CANNOT be submitted prior to 4 months of the expiration date.

A Late Fee penalty is issued for each month the Self-Assessment is late. Penalties continue to accumulate throughout the approval process.

If an organization has not completed the re-application process by the expiration date they will be removed from the EHNAC Web site. The entity has a 30-day grace period past the expiration date for submission of the Self-assessment and the accreditation process must be completed by the end of the 90 days past the expiration date or the entity must begin the application process again including remittance of all fees.

See page 4 to review a sample Accreditation Timeline or see page 10 for more details on the Late Submission Policies.

Additionally, when the Self-Assessment process requires subsequent resubmissions of documentation to meet the criteria, there will be a charge of \$200/hour for site reviewer time per each additional submission of documentation.

Financial penalties are also assessed for late submission of Annual Fees and are listed below.

| | Revenue | Late penalty |
|-------------------------------|-------------------------------------|---------------------------|
| Very small | Less than \$3M | \$750/month/ Program |
| Small and Outsourced Programs | Greater than \$3M; less than \$8M | \$1,000/month/ Program |
| Medium | Greater than \$8M; less than \$20M | \$1,500/month/ Program |
| Med/Large | Greater than \$20M; less than \$50M | \$1,500/month/ Program |
| Large | Greater than \$50M; less than \$75M | \$2,000/month/ Program |
| Very large | Greater than \$75M | \$2,000/month/ Program |

Late Submission Policies

| | Situation | Policy |
|---|--|--|
| 1 | <p>When a first-time accredited organization does not pay the Annual Fee and any applicable fees within one month after they are accredited.</p> | <p>A first-time accredited organization is issued an invoice within a week after their accreditation for that year's Annual Fee and is given 30 days to remit payment. If payment is not received within 45 days from the invoice date, the organization is removed from the EHNAC website, and will be reinstated on the website when payment is received. Penalties will be assessed from the due date until the Annual Fee is received. [Not pro-rated] If payment is not received within 120 days the organization is no longer accredited and must begin the process over.</p> |
| 2 | <p>When an accredited organization does not pay the Annual Fee by the accreditation date.</p> | <p>An invoice is issued 2 months before payment is due. If the Annual Fee and Late Fee payment are not received within 45 days past the Annual Fee due date the organization is removed from the EHNAC website and will be reinstated on the website when payment is received. Penalties will be assessed from the due date until the Annual Fee and any late fees are received [Not pro-rated]. If the entity has not paid the Annual Fee and the accrued late fees by the end of the 90 days past the Annual Fee due date, they must begin the application process again. All incurred penalties must be paid before a subsequent application can be approved.</p> |
| 3 | <p>When a Self-assessment is NOT submitted by the due date (4 months before expiration date) however it is submitted before the expiration date.</p> | <p>The organization must submit a formal request for an extension and provide reasons for the request. Penalties are issued for each month the Self-assessment is late. Penalties will be assessed until the Self-assessment is submitted.</p> <p>Please note: EHNAC will send a correspondence to the Organization's contact requesting the extension request or status, and if the organization doesn't respond in writing within 7 days to the EHNAC correspondence indicating their intention to proceed with the accreditation process and to submit when the Self-assessment is due, then it will be assumed that the organization no longer intends to maintain their accreditation status and will be removed from the website and they will no longer be accredited.</p> <p>If the Self-assessment is not submitted 1 month before the expiration date the late fee will start to accrue from the Self-assessment due date and will continue until the date the accreditation is approved.</p> |
| 4 | <p>Accreditation is not achieved and the Expiration date takes place.</p> | <p>If the accreditation is not completed before the expiration date, the late fee will start to accrue from the expiration date and will continue until the date the accreditation is approved.</p> |
| 5 | <p>When an accredited organization completes the Application Process after the Expiration Date.</p> | <p>As of the expiration date the organization is no longer accredited and is removed from the EHNAC website and must begin the application process again. The late fees must be paid from the Self-Assessment due date through the Expiration date.</p> <p>If the application process is completed after the expiration date the applicant will have a gap in their accreditation, must reapply again, and upon attaining accreditation will be issued a new base accreditation number.</p> |
| 6 | <p>When an accredited organization completes the Application Process but has not submitted the Self-assessment prior to the expiration date.</p> | <p>The organization must submit a formal request for an extension and provide rationale for the request. Penalties are issued from the date the Self-assessment was due (4 months prior to expiration) until accredited.</p> <p>The entity has a 30-day grace period past the expiration date for submission of the Self-assessment. The accreditation process must be completed by the end of the 90 days past the expiration date or the entity will be removed from the EHNAC website and must begin the application process again. All incurred penalties must be paid before a subsequent application or accreditation can be approved.</p> |

| | | |
|---|---|---|
| 7 | <p>When an accredited organization completes Self-assessment or the accreditation process after the expiration date.</p> | <p>The organization must submit a formal request for an extension and provide rationale for the request. Penalties are issued from the date the Self-assessment was due (4 months prior to expiration) until accredited.</p> <p>The entity has a 30-day grace period past the expiration date for submission of the Self-assessment and the accreditation process must be completed by the end of the 90 days past the expiration date or the entity will be removed from the EHNAC website and must begin the application process again. All incurred penalties must be paid before a subsequent application or accreditation can be approved.</p> |
| 8 | <p>When the Self-assessment process requires a number of resubmissions of supplemental documentation to meet the Criteria and possibly additional site visits.</p> | <p>Late penalties remain the same as above. A charge of \$200/hour for site reviewer analysis time for each additional submission of supplemental documentation can be assessed. Charges for any additional site visits and site reviewer expenses can also be assessed.</p> |
| 9 | <p>When an organization is approved in the accreditation ballot process and has not paid fees including Late Fees, Site Visit Expense, etc.</p> | <p>If the organization has not paid all outstanding fees within 60 days of the ballot approval date they will be removed from the EHNAC website and must begin the accreditation process over again after all existing fees are paid.</p> |

Site Visits

Site visits are made to all accreditation candidates to validate the materials presented in the Self-Assessment Report, to conduct interviews with various individuals, to review facility security, etc. Sites visited include both corporate sites and outsourced sites based on the services provided for the program under review. A minimum of one on-site visit is made, even if the organization is 100% virtual (in which case the review is held at a location in the vicinity of the corporate location). The site reviewer makes a confidential report to the Commission and recommends either: Full Accreditation, Provisional Accreditation or denial of the accreditation. [Site reviewers](#) also advise the organizations regarding best practices to assist them continually improve their services to the healthcare community that they serve.

Site Reviewers

Site reviewers are selected by the Commission from a group of experienced professionals. Periodic professional development is provided to ensure that sufficient resources and specific areas of expertise are always available. A single site reviewer is generally assigned. However, when the size or diversity of the organization's operations requires it, a team may be assigned. If there is a major concern regarding the site reviewer selected to conduct the site review, please immediately contact EHNAC to discuss the issue and determine if an alternate resource can be assigned.

Site Visit Process

Site reviewers are required to review the candidate's Self-Assessment Report at least two weeks in advance of the site visit. The site reviewer and the candidate should develop, at least a week before the visit, a site visit schedule including any meetings with individuals or groups, requirements for access to records and an "open" period during which employees may have free access to the site reviewer for questions/follow-up.

Site reviewers must restrict their review to activities that are necessary to their role as site reviewers for the Commission. It is important for the site reviewer to avoid involvement in personnel issues or becoming an advocate for any individual or group involved in making internal decisions.

At the conclusion of the site visit, the site reviewer conducts an exit interview with the CEO, or designee, and any others the candidate determines to include. The purpose of the exit interview is to summarize the site reviewer's conclusions about the accuracy of the Self-Assessment Report and the completeness of the degrees of compliance with the Commission's criteria. The candidate cannot, however, at this time be fully informed of all recommendations to be made by the site reviewer to the Commission.

Site Visit Report

A site visit report is completed by the site reviewer within ten (10) business days of the site visit, or, if follow-up evidentiary documentation is required, within ten (10) business days of receipt of the follow-up information. The draft report is sent to the candidate for correction of factual errors and must be returned to the site reviewer within ten (10) business days of receipt. The final report is then presented to the Commission by the site reviewer. The report includes:

- evaluation of the accuracy of the Self-Assessment Report;
- description of the degree of compliance with each of the Commission's criteria;
- any additional information that bears on the ability of the candidate to maintain creditable levels of service to its clients; and
- recommendations for action – either Full or Provisional Accreditation or denial of the application.

If the recommendation is for Provisional Accreditation, the site reviewer specifies those areas that require improvement and recommends a timeframe for achieving a satisfactory level of performance. The Commission will determine whether or not an additional site visit is necessary. If the recommendation is for denial of accreditation, the report specifies the criteria in which the candidate is deficient.

Post Visit Restrictions

Site reviewers cannot use information obtained during the site visit for personal profit and must agree in writing to refrain, for a period of one year, from accepting payment for personal, business or consulting services from the candidate.

Appeal Policy

The appeal process is for those organizations that have either been awarded Provisional Accreditation or Failed Accreditation by the EHNAC Commission.

Appeal Process

Organizations need to follow the process outlined below if they are in disagreement with the EHNAC determination of accreditation status. The submission of the required appeal materials must be received by EHNAC within two weeks of the Provisional or Failed award notification.

- 1) Submit a written appeal to the Executive Director documenting the rationale for such; document the actions taken to remediate identified issues; provide a chronology of dates of submission against all delivery dates including email correspondence documentation; provide all documentation provided to EHNAC; and provide any other pertinent information or extenuating circumstances;
- 2) Executive Director will log and review appeal request and make an initial determination whether said appeal should be forwarded to the EHNAC Executive Committee for consideration. The determination of such referral to the Executive Committee is at the sole discretion of the Executive Director. Executive Director will make the determination whether other organizations need to be consulted which could elongate the timeline for any determination. Timeline for such determination is within 2 weeks of receipt of the written appeal provided all pertinent information was supplied for the review (unless other entities need to be consulted which may elongate this timeline).
- 3) If determined by the Executive Director to refer such matter and determination to the Executive Committee, a full report and all documentation will be provided within 2 weeks of such request. Timeline for a final determination will be made within 2 weeks of Executive Director making such request.

Revised 3/1/18