



DirectTrust  
EHNAC



# Accreditation Guidelines

## Table of Contents

<b><u>The Accreditation Process</u></b>	<b>3</b>
<b><u>The Midterm Accreditation Process</u></b>	<b>5</b>
<b><u>The Certification Process for TDRAAP-Basic</u></b>	<b>6</b>
<b><u>Sample Accreditation Timeline</u></b>	<b>7</b>
<b><u>Accreditation Fees</u></b>	<b>8</b>
<b><u>Accredited Organizations Adding New Programs Between Accreditation Cycles</u></b>	<b>10</b>
<b><u>Site Visit Fees</u></b>	<b>11</b>
<b><u>Submission Requirements</u></b>	<b>12</b>
<b><u>Late &amp; Incomplete Submissions</u></b>	<b>13</b>
<b><u>Late Submission Policies</u></b>	<b>14</b>
<b><u>Site Visits</u></b>	<b>17</b>
<b><u>Appeal Policy</u></b>	<b>19</b>

We, at DirectTrust, 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 and appeals process, modifications, and late penalties.

If you would like additional information on the topics discussed below, please visit [our website](#), and/or send any questions or comments to [admin@directtrust.org](mailto:admin@directtrust.org).

## The Accreditation Process

Both first time applicants and re-accreditation candidates follow the same process for achieving accreditation. The accreditation cycle is for 2 years. The previous accreditation ceases to exist when a new accreditation takes effect. Once an accreditation ballot takes place the organization begins a new accreditation cycle based on the criteria that were reviewed during that accreditation period.

### Application Process

Organizations interested in knowing if they qualify for accreditation must complete the [Application](#) on the website.

An [Applicant Agreement](#) document and a [Sentinel Events](#) document must both be signed by the applicant and submitted in PDF format via email or uploaded to 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 declare they are at the highest revenue level, or are State, Federal or Non-profit do not need to submit this document for validation. Organizations pursuing OSAP accreditation, CCCAP accreditation, TDRAAP-Basic or EPCS certification are not required to submit a financial statement.

### Summary of the Accreditation Process

1. Application Process:
  - a. Complete the electronic [Application](#).
  - b. A clarification letter is emailed to gather or confirm any required information.
  - c. A detailed letter is emailed to the organization with the instructions for the remaining steps of the application process.
  - d. Email or Log into the “Log an Application” portal and upload the signed Applicant Agreement, Sentinel Events document, and revenue verification in PDF format.
  - e. Make payment of applicable application fees electronically or via check [Annual Fee, Multiple Program & Site Visit Fee(s)].
2. Upon completion of the Application Process and approval, the self-assessment zip file will be made available to the organization, the Assessor will be assigned, and the organization will be added to the [Accredited Organizations](#) page as a Candidate.
3. Submit completed self-assessment via the documents portal **4 months prior to the expiration date**. New applicants can submit the self-assessment as soon as it is completed, prior to 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 Assessor has questions or determines that the submission is incomplete, they may request that the self-assessment be resubmitted before a date is set for site visit(s).
5. Site visits are completed, and the Assessor completes the draft Accreditation Report.
6. The draft Accreditation Report is reviewed and refined through an internal QA process.
7. If applicable, make payment of the Site Visit Travel Expense fees.
8. Applicant organization approves draft Accreditation Report.
9. The Commission reviews and votes on the Accreditation Report.
10. The organization will be informed whether the accreditation/certification has been approved or denied.
11. Upon approval of accreditation/certification and payment of all fees, the organization’s status is changed to Accredited on the [Accredited Organizations](#) 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 Process above). 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. ***It is important to remember that the Re-accreditation Process always begins 1 year prior to the expiration date.***

## The Midterm Accreditation Process

DirectTrust offers an accreditation with Midterm review. While our standard reviews (“Full Accreditations”) are biennial (2-year), the optional Midterm reviews occur in intervening years.

When Midterm reviews are conducted, their expiration date will always be the same as the Full Accreditation expiration date.

### Midterm Application Process

1. Application Process:
  - a. Organization informs DirectTrust of intent to have a Midterm review. This request must be made at least 6 months prior to the accreditation one-year anniversary date.
  - b. Organization makes payment of Midterm Accreditation Fee electronically or via check five (5) months prior to the accreditation anniversary date.
2. DirectTrust makes available to the organization the self-assessment zip file and assigns the Assessor within two (2) weeks after payment of the Midterm Accreditation fee.
3. Organization submits completed self-assessment via the documents portal **2 months prior to the Full Accreditation anniversary date**.
4. If the self-assessment contains sufficient satisfactory information and documentation, a virtual review will be scheduled to verify the information contained therein. If the assigned Assessor determines that the submission is incomplete, they may request that the self-assessment be resubmitted before a date is set for the review.
5. Assessor completes the assessment and provides the Midterm Accreditation Report.
6. DirectTrust will inform the organization of whether the Midterm accreditation/certification has been approved or denied.
7. Upon approval of the Midterm accreditation/certification, the organization’s status will indicate Midterm Accredited on the [Accredited Organizations](#) page.

**IMPORTANT: If a satisfactory self-assessment is not received within one month following the organization’s expiration date, a Midterm review will no longer be available for that accreditation cycle.**

## The Certification Process for TDRAAP-Basic

Both first time applicants and re-certification candidates will follow the same process for achieving certification. The certification cycle is for 1 year. The previous certification ceases to exist when the new certification takes effect and is based on the criteria that was reviewed during that certification period.

### Application Process

Organizations interested in knowing if they qualify for certification must complete the [Application](#) on the website.

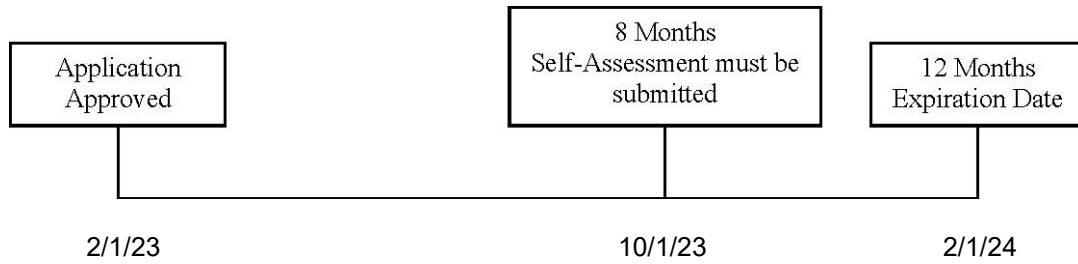
An [Applicant Agreement](#) document and a [Sentinel Events](#) document must both be signed by the applicant and submitted in PDF format via email or uploaded to the “Log an Application” portal.

### Summary of the Certification Process

1. Application Process:
  - a. Complete the electronic [Application](#).
  - b. A clarification letter is emailed to gather or confirm any required information.
  - c. A detailed letter is emailed to the organization with the instructions for the remaining steps of the application process.
  - d. Email or Log into the “Log an Application” portal and upload the signed Applicant Agreement and Sentinel Events document in PDF format.
  - e. Make payment of applicable application fees electronically or via check.
2. Upon completion of the Application Process and approval, the self-Attestation zip file will be made available to the organization, and they will be added to the [Accredited Organizations](#) page as a Candidate.
3. Applicants must submit the completed self-attestation via the documents portal no later than 10 business days before the expiration date.
4. Organizations seeking TDRAAP-Basic certification will be awarded such status based on their ability to meet objectives defined in the criteria as pass/fail with a maximum of 3 attempts. This must take place 10 business days before the expiration date.
5. The organization will be informed within 30 days or by the expiration date, whichever comes first, whether the certification has been approved or denied.
6. Upon approval of certification the organization’s status is changed to Certified on the [Accredited Organizations](#) page.

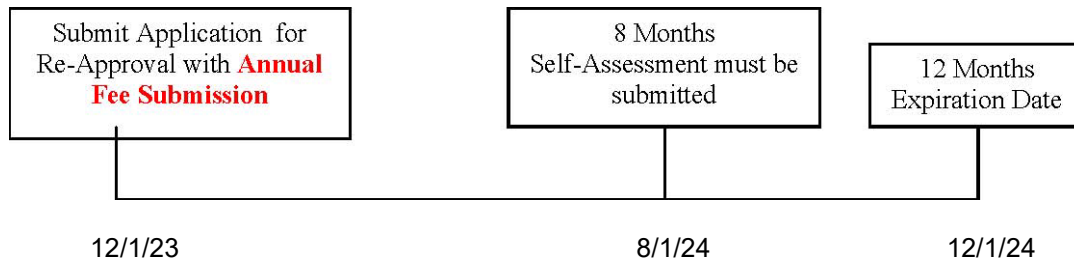
# Sample Accreditation Timeline

## First Time Applicant



If Accreditation is achieved 12/1/23 this becomes the 2-Year Accreditation Date. Annual Fee is then due each year by this date. Accreditation expiration date would be 12/1/25. Next self-assessment would be due 8/1/25.

## 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

Accredited Organization's fees are based on revenue.

Accreditation fees are based on an organization's annual revenue.

Each year, Accredited Organizations must submit an Annual Revenue Financial Verification to DirectTrust. For new organizations, this is submitted as part of the application process.

### How to Determine an Organization's Size

Organization annual revenue is defined as any and all revenue collected annually for services performed, whether electronically or manually, that supports the program being applied for. This includes all services related to electronic transactions, patient statements, customer service, infrastructure, technical performance, business practices, privacy and security and resources.

The revenue from banking/financial organizations is based upon the size of their treasury management operations which is responsible for the healthcare services business line. Healthcare trading partners include such entities as providers (such as physicians and hospitals), labs and ancillary professionals, health plans, 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	Multiple Program Fee	Late Penalty
CCCAP*	NA	\$3,250	\$4,000	NA	\$750
EPCS**	NA	\$3,250	\$4,000	\$1,625	\$750
Very Small	Under \$3M	\$3,250	\$5,000 <sup>‡</sup>	\$1,625	\$750
Small	Greater Than \$3 Less Than \$8M	\$4,250	\$5,000 <sup>‡</sup>	\$2,125	\$1,000
OSAP***	NA	\$4,250	\$5,000 <sup>‡</sup>	NA	\$1,000
Medium	Greater Than \$8 Less Than \$20M	\$8,500	\$8,000 <sup>‡</sup>	\$4,250	\$1,500
Med/Large	Greater Than \$20 Less Than \$50M	\$13,000	\$8,000 <sup>‡</sup>	\$6,500	\$1,500
Large	Greater Than \$50M Less Than \$75M	\$20,000	\$8,000 <sup>‡</sup>	\$10,000	\$2,000
Very Large	Greater Than \$75M	\$26,500	\$8,000 <sup>‡</sup>	\$13,250	\$2,000

**Federal, state and non-profit organizations are included in the Small size above.**

\* - If an organization selects the HITRUST version of the criteria and the organization does not currently have HITRUST certification there is an additional Site Visit Day Fee.

Each site visit review fee is considered one day. Site visits can be either virtual or at the site.

### 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 application process.



**Site Visit Fee(s)**

For new applicants, the Site Visit Fee(s) must be paid along with the Annual Fee as part of the application process. For reaccreditations, the Site Visit Fee(s) is due no later than 8 months prior to the accreditation expiration date, as part of the application process.

**Midterm Accreditation Fee**

DirectTrust offers a Midterm review for accredited organizations wishing to pursue this. The fee is \$4,000 per program.

**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. The following programs are not applicable for the Multiple Program Fee: CCCAP, OSAP, and TDRAAP-Basic.

**\*CARIN Code of Conduct CCCAP**

The Annual Fee is \$3,250 for all organizations regardless of the revenue. The Site Visit Fee is \$5,000 per site regardless of the revenue. The Multiple Program Fee is not applicable.

**\*\*EPCSCP-Pharmacy and EPCSCP-Prescribing Certification Fees**

EPCSCP Annual Fee \$3,250 is paid annually, and the Review Fee \$4,000 is paid every 2 years with the certification. There is no site visit required for EPCSCP. The Annual Fee is \$3,250 per organization regardless of revenue. If an organization wishes to certify both EPCSCP-Pharmacy and EPCSCP-Prescribing as a second Certification program or has multiple versions there is an EPCS Multiple Program Fee of \$1,625 every two years and an additional Review Fee of \$4,000. The Multiple program Fee applies only to additional EPCS certifications.

**\*\*\*Outsourced Program OSAP**

The Annual Fee is \$4,250 per organization regardless of revenue. The Site Visit Fee is \$5,000 per site regardless of the revenue. The Multiple Program Fee is not applicable.

**TDRAAP-Basic Certification Fees**

This \$1,200 fee is paid annually for the 1-year certification. The Multiple Program Fee is not applicable.

**Re-accreditation Fees**

The fees are the same for each 2-year accreditation. The Annual Fee is paid each year and all other fees are paid every other year on the accreditation year.

**Site Visit Fees for Sites Outside the US**

International 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). See [International Travel Process](#) for additional fee details. See [International Accreditation](#) page for definitions and details.

**CAQH and CORE Members Discount**

CORE certified entities 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 when submitting its application. View the [CAQH CORE website](#) 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 program [other than OSAP, CCCAP, EPCS or TDRAAP-Basic] between accreditation cycles, and has the same sites to review, the Multiple Program Fee will apply, and a \$3,000 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. For programs that cannot be a Multiple Program, the associated Annual Fee will apply (OSAP \$4,250 / CCCAP or EPCS \$3,250 / TDRAAP-Basic \$1,200).

If the new program is added prior to the 1-year anniversary, then it will be included in the 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 EPCS where the certification cycle cannot exceed 2 years. It also does not apply to TDRAAP-Basic, as that is a 1-year certification.

Example: If the accreditation date is 6/1/23 and the new program is added before 6/1/24 it will be incorporated into the current [2023] accreditation cycle and be included in the next [2025] accreditation. If the new program is added after 6/1/24 only changes will need to be reported during the next [2025] accreditation and it will be incorporated into the following [2027] accreditation cycle.

### Summary of the Adding Multiple Program Process

1. Application Process:
  - a. Complete the electronic [Application](#).
  - b. Make payment of applicable fees electronically or via check [Multiple Program, Site Visit Fee(s), Desk Review].
2. Upon completion of the Application Process and approval, the Self-assessment zip file will be made available to the organization, the Assessor will be assigned, and the organization will be added to the [Accredited Organizations](#) page as a Candidate.
3. Submit completed self-assessment via documents 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 desk review will be scheduled to verify the information contained in the self-assessment. If the assigned Assessor has questions or does not feel it is complete, they may request the self-assessment be resubmitted before a date is set for the site visit(s).
5. If applicable, site visit(s) are completed, and the Assessor completes the draft Accreditation Report.
6. The draft Accreditation Report is reviewed and refined through an internal QA process.
7. If applicable, make payment of the Site Visit Travel Expense Fees.
8. Applicant organization approves the draft Accreditation Report.
9. The Commission reviews and votes on the Organization-approved Accreditation Report.
10. The organization will be informed whether the accreditation/certification has been approved or denied.
11. Upon approval of accreditation/certification the organization's status is added to the [Accredited Organizations](#) page.

## Site Visit Fees

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

For financial organizations with multiple lockbox facilities and for OSAP applicants that have sites that perform the same function demonstrating 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, outsourced 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 any physical site visit(s) occur.

In addition to the Site Visit Fee(s), 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 \$225/hour for the Assessor time per additional submission of documentation.

## Submission Requirements

Applicant organizations must submit:

1. Annual, Site Visit and other applicable fees (Electronically or mailed)
2. Signed Applicant Agreement
3. Signed Sentinel Events
4. Verification statement of organization's revenue related to the program for which they have applied.

*All documents should be emailed or uploaded to the "Log an Application" portal.*

Upon receipt and review of all the above items, DirectTrust will determine if the Applicant is accepted for accreditation processing and further reviewed 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.

### TDRAAP-Basic:

When the applicant completes the application process, the applicant is assigned Candidate status. If the application is not approved, the application fees are returned (less a processing charge of \$200). If the candidate withdraws from or does not complete the application process for the TDRAAP-Basic certification program within three (3) months after receipt of payment, no funds paid as part of the application process will be refunded to the candidate. *NOTE: The candidate must provide formal notification within three (3) months of the payment receipt date to receive a refund (less the \$200 processing charge).* For re-certification, no fees paid by the organization will be refunded after three (3) months from receipt of payment by DirectTrust.

If the TDRAAP-Basic certification expires, any unused non-refundable TDRAAP-Basic Annual Fees may be applied toward a subsequent TDRAAP-Basic certification for up to six (6) months from the expiration date. The Application Process must be completed by the last day of the six (6) month period for the payment to be applied to the new certification. Note: An organization must provide formal notification of their intent to re-apply and use the remaining funds toward a new TDRAAP-Basic certification within four (4) months after the expiration date.

### Full Accreditation/Certification Programs:

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 or does not complete the application process for the accreditation program within three (3) months after receipt of payment, no funds paid as part of the application process will be refunded to the candidate. *NOTE: The candidate must provide formal notification prior to three (3) months from the acceptance date to receive a refund (less the \$500 processing charge).* For re-accreditation, no fees paid by the organization will be refunded after three (3) months from receipt of payment by DirectTrust.

The Self-assessment zip file is made available to candidates. This contains all of the instructions and documentation needed to complete the self-assessment package. *(If this is a re-accreditation submission, assure that any previous recommendations provided in the previous accreditation report are addressed as well.)*

DirectTrust will review the self-assessment package to determine if it has been satisfactorily completed and is supported by the required evidentiary documentation. If this is a re-accreditation submission, ensure that any previous recommendations are also addressed along with any evidentiary documentation as well. Once DirectTrust has accepted the candidate's self-assessment package, the Assessor will contact the candidate to schedule a date for the site review(s) to verify compliance with the information reported. If the Assessor has questions concerning the self-assessment package, they may return it to the applicant for further information, documentation, or clarification before a date is scheduled for the site review(s).

An invoice will be sent for the travel expenses after the 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.

## Late & Incomplete Submissions

The complete self-assessment package must be submitted 4 months prior to that candidate's accreditation expiration date. This package must be in the specified structure and provide 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 before 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, it will be removed from the Accredited Organization page of the website. 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 7 to review a sample Accreditation Timeline or see pages 15 -17 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 \$225/hour for Assessor time per each additional submission of documentation.

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

	Revenue	Late penalty
Very small & EPCS	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 an Applicant/ Re-applicant pays the <b>Annual &amp;/or Site Visit Fees</b> and is not approved, withdraws, or does not complete the application process within three (3) months from receipt of payment by DirectTrust.</p>	<p><b><u>TDRAAP-Basic Certification Program</u></b>            If the application is not approved the application fees are returned (less a processing charge of \$200). If the candidate withdraws from or does not complete the application process for the TDRAAP-Basic certification program within three (3) months after receipt of payment, no funds paid as part of the application process will be refunded to the candidate.</p> <p>If the TDRAAP-Basic certification expires any unused, non-refundable TDRAAP-Basic Annual Fees may be applied toward a subsequent TDRAAP-Basic certification for up to six (6) months from the expiration date. The Application Process must be completed by the last day of the six (6) month period for the payment to be applied to the new certification. Note: An organization must provide formal notification of their intent to re-apply and use the remaining funds toward a new TDRAAP-Basic certification within four (4) months after the expiration date.</p> <p><b><u>EHNAC Full Accreditation/Certification Programs</u></b>            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).</p> <p>If the candidate withdraws from or does not complete the application process for the accreditation program within three (3) months after receipt of payment no funds paid as part of the application process will be refunded to the candidate.</p>
2	<p>When a first-time accredited organization or organization with an Annual Fee adjustment does not pay the <b>Annual Fee</b> and any applicable fees within one month after they are accredited.</p>	<p>The accredited organization is issued an invoice and is given <b>30 days</b> to remit payment.</p> <p>If payment is not received within <b>45 days</b> from the invoice date, the organization is removed from the website, and will be reinstated 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 application process again.</p>
3	<p>When an accredited organization does not pay the <b>Annual Fee</b> by the accreditation date.</p>	<p>An invoice is issued <b>2 months</b> before payment is due.</p> <p>If the Annual Fee and Late Fee payment are not received within <b>45 days</b> past the Annual Fee due date the organization is removed from the website and will be reinstated 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 <b>by the end of the 90 days</b> 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>

4	<p>When a <b>Self-assessment</b> 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 <b>formal request for an extension</b> 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: DirectTrust 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 <b>7 days</b> to the 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. The organization will be removed from the website and will no longer be accredited.</p> <p>If the self-assessment is not submitted <b>1 month</b> prior to 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>
5	<p>When an accredited organization completes the <b>Application Process</b> after the Expiration Date.</p>	<p>As of the expiration date the organization is no longer accredited, is removed from the 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 <b>after the expiration date</b> 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 <b>Application Process</b> but has not submitted the <b>Self-assessment</b> prior to the expiration date.</p>	<p>The organization must submit a <b>formal request for an extension</b> 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 <b>by the end of the 90 days</b> past the expiration date, or the entity will be removed from the 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 the <b>Self-assessment</b> or the <b>accreditation process</b> after the expiration date.</p>	<p>The organization must submit a <b>formal request for an extension</b> 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 <b>by the end of the 90 days</b> past the expiration date or the entity will be removed from the 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 an organization completes the <b>accreditation process</b> however they have not received <b>HITRUST Certification</b>.</p>	<p>When a HITRUST assessment is conducted by another Assessor organization, HITRUST Certification must be achieved by the accreditation expiration date in order to be accepted as evidence for accreditation. Late fees as described in #6 above.</p> <p>If HITRUST Certification is not awarded, all applicable evidence must be provided within 2 weeks (or specified timeframe) and either a Desk Review or additional Site Visit (and associated fees) will be required, at the discretion of the Assessor. All incurred penalties must be paid before a subsequent application can be approved.</p>
9	<p>When the <b>Self-assessment</b> process requires submissions of supplemental documentation and/or additional site visits to meet the criteria.</p>	<p>Late penalties remain the same as above. A charge of \$225/hour will be invoiced for Assessor analysis time of additional documentation and evidence. Charges for any additional site visits and Assessor travel expenses can also be invoiced.</p>
10	<p>When an organization is approved in the <b>accreditation ballot process</b> and has not paid fees including <b>Late Fees, Site Visit Travel Expenses, etc.</b></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 website and must begin the accreditation process again after all existing fees are paid.</p>

11	<b>When an accredited organization requires payment for Site Visit or other fees.</b>	If payment is not received within <b>30 days</b> from the invoice date, the organization is removed from the website and will be reinstated once payment is received. Self-assessment late fees will be assessed from the due date until the payment is received [Not pro-rated]. If payment is not received within 90 days, the organization is no longer accredited and must begin the process again.
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## Site Visits

Site visits are made to all accreditation candidates to validate the materials presented in the self-assessment package, 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 Assessor makes a confidential report to the Commission and recommends either: Full Accreditation, Provisional Accreditation or denial of the accreditation. [Assessors](#) also advise the organizations regarding best practices to assist them to continually improve their services to the healthcare community that they serve.

### Assessors

DirectTrust selects its Assessors 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 Assessor 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 Assessor selected to conduct the review, please immediately contact DirectTrust to discuss the issue and determine if an alternate resource can be assigned.

### Site Visit Process

Assessors are required to review the candidate's self-assessment package at least two weeks in advance of the site visit. The Assessor and candidate should develop, at least a week prior to the site visit, an agenda 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 Assessor for questions and/or follow-up.

Assessors must restrict their review to activities that are necessary to their role for the review. It is important for the Assessor 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 Assessor 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 Assessor's conclusions about the accuracy of the Accreditation Report and the completeness of the degrees of compliance with the criteria. However, the candidate cannot at this time be fully informed of all recommendations to be made by the Assessor to the Commission.

### Accreditation Reports

Accreditation Reports are created, refined, finalized, and published as follows:

- A draft Accreditation report is completed by the Assessor 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 appropriately completed follow-up information. This draft report is further refined through our internal QA Process.
- The draft Accreditation Report is sent to the candidate for correction of factual errors and must be returned to the Assessor within ten (10) business days of receipt. The candidate must approve the draft Accreditation Report in order to submit it to the Commission for a final ballot.
- The Accreditation Report is then submitted to the Commission for voting. The report includes:
  - evaluation of the accuracy of the Accreditation Report.
  - description of the degree of compliance with each of the 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 accreditation requirements.
- The Commission reviews and votes on the organization-approved Accreditation Report.
- The organization will be informed whether the accreditation/certification has been approved or denied.

- Upon approval of accreditation/certification the organization's status is added to the [Accredited Organizations](#) page of the website, and the following Accreditation Final Reports are provided:

1. **The Executive Summary Report:** For senior management, providing a concise summary of the overall review.
2. **The Full Report:** Includes all the detailed criteria and responses, along with specific recommendations identified to be addressed prior to the next accreditation cycle. Because this report is so comprehensive, it may also be helpful in satisfying third-party assessment questionnaires.
3. **The Summary Report for Third Parties:** Intended for third parties that have an interest in your accreditation status but do not require detailed information.
4. **The Recognized Security Practices (HIPAA Safe Harbor Law) Report:** According to the 2011 H.R. 7898 – Public Law 116-321 (also known as the “HIPAA Safe Harbor Law”), in order for an organization to avail itself of decreased enforcement penalties/fines and audit scrutiny, each HIPAA Covered Entity and/or Business Associate must be able to demonstrate compliance with Recognized Security Practices for at least a 12-month period of time. Accreditation demonstrates compliance against these Recognized Security Practices. Therefore, this report provides confirmation of compliance with HIPAA Security, the NIST Cybersecurity Framework, the applicable components of the HITECH Breach Act as well as the relevant components of HIPAA Privacy. Also, NIST SP 800-171 Rev2 scoring is provided, demonstrating compliance against the specified NIST 800-53 Rev 4 families of security controls per the 800-171 Rev 2 framework. Your organization's compliance against these standards is provided in graphical format.

*Note: Some Programs, such as TNAP, CCCAP, EPCS and TDRAAP Basic do not produce the Recognized Security Practices Reports since the related criteria are not included within those programs.*

- If the recommendation is for Provisional Accreditation, the Assessor 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**

All information provided by the candidate for the review is securely destroyed or is kept in secure confidential archives. This information may not be used by DirectTrust or its workforce for any purpose outside of the intent of accreditation, unless such authorization is made in writing by an authorized representative of the candidate.

## Appeal Policy

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

### Appeal Process

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

1. Submit a written appeal to the President and CEO and Commission Chair 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 delivered to DirectTrust; and provide any other pertinent information or extenuating circumstances.
2. The President and CEO and Commission Chair will log and review appeal request and make an initial determination whether said appeal should be forwarded to the EHNAC Commissioners for consideration. The determination of such referral to the EHNAC Commissioners is at the sole discretion of the President and CEO and Commission Chair. A determination will be made whether other organizations need to be consulted which could elongate the timeline for any determination. The 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 President and CEO and Commissioner Chair to refer such matter and determination to the EHNAC Commissioners, 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 President and CEO and Commissioner Chair making such request.

Revised 3/02/23.