AMA response to The Joint Commission principles for users of external credentialing agents and sources regarding the primary source reported data contained in AMA Physician Professional Data™

As outlined in The Joint Commission (TJC) Accreditation Standards, AMA Physician Professional Data, formerly AMA Physician Masterfile, is deemed an “equivalent source” for physician medical school and postgraduate medical training.

AMA Physician Professional Data has been designated by the American Board of Medical Specialties (ABMS®) as an official display agent of ABMS board certification information. Therefore, the AMA Physician Profile is considered a designated “equivalent source” for ABMS board certification in accordance with TJC standards. TJC states that an organization or entity may designate a display agent for its information (as ABMS has done for the AMA Physician Profile). A copy of the official letter from ABMS designating the AMA Physician Profile as an official display agent is available at the end of this document.

The other primary-source-reported information on the AMA Physician Profile (e.g., state licensure, federal DEA registration) is subject to TJC principles for evaluating an external agent for primary source credentialing information (“external agent principles”). AMA Physician Professional Data meets and/or exceeds these TJC principles for the additional primary source information on the Profile.

As previously noted, the medical school, postgraduate medical training, and ABMS board certification information on the AMA Physician Profile are not subject to these external agent principles. However, they have been included in the responses to these principles to provide additional information to the user.

Following are the AMA’s responses to these principles regarding use of AMA Physician Professional Data.

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1. The agency makes known to the user the data and information it can provide.

AMA Response

A sample profile is available publicly on the AMA Credentialing Services website. All physician information on the Profile is from a primary source except current practice data provided by the physician (e.g., self-designated practice specialty, current address, etc.). The primary-sourced data are labeled as follows on the AMA Profile:

- Current and/or historical medical school
- Current and/or historical ACGME-accredited graduate medical training programs
- ECFMG certification
- Current and/or historical medical licensure
- US Drug Enforcement Administration (DEA)
- Current and/or historical National Provider Identifier (NPI) information
• Specialty board certification (specific to the 24 boards recognized by the American Board of Medical Specialties)
• Action notifications reported to the AMA (including medical licensing board, Medicare/Medicaid, and DEA sanctions)
• AMA Physician’s Recognition Award (evidence of CME credits earned at AMA continuing education programs and kept on file at AMA)

2. The agency provides documentation to the user describing how its data collection, information development, and verification process(es) are performed.

AMA Response
The AMA Credentialing Services website provides information on how the primary source data in AMA Physician Professional Data is collected, maintained, and verified. The document is titled Description of AMA Physician Professional Data for AMA Profiles and the webpage is titled AMA Physician Professional Data.

3. The user is given sufficient, clear information on database functions, including any limitations of the information available from the agency (such as practitioners not included in the database), the timeframe for agency responses to requests for information, and a summary overview of quality control processes related to data integrity, security, transmission accuracy, and technical specifications.

AMA Response
The document Description of AMA Physician Professional Data for AMA Profiles and webpage AMA Physician Professional Data describe the practitioner population within AMA Physician Professional Data to include all doctors of medicine (MDs) in the United States who have completed or are completing requirements to practice medicine and US-trained physicians temporarily overseas. AMA Physician Professional Data includes AMA members and nonmembers and graduates of international medical schools residing in the United States.

These documents also indicate the inclusion of doctors of osteopathic medicine (DOs) who are members of the AMA, are enrolled in or have completed residency training programs accredited by the Accreditation Council for Graduate Medical Education (ACGME), have been licensed or have had disciplinary actions taken by state licensing agencies, or have specifically requested that they be listed.

While data within AMA Physician Professional Data are comprehensive, a limitation does exist regarding state licensure and Medicare/Medicaid sanctions.

AMA Physician Profiles do not display the details of final disciplinary actions relating to physicians,
listing only the authority that issued the action. If the AMA has received a final disciplinary action taken by the state licensing board, Medicare/Medicaid, DEA, or other Federal Government sources (US military, Veterans Administration, US public health source), users are directed to the site of the organization that maintains such data, as annotated on the Profile under the “Action notifications reported to the AMA” section. For example, a licensure action will read, “ACTION REPORTED. Contact the state board for [state name].” A similar statement appears if an action has been taken by Medicare/Medicaid, DEA, or another Federal Government source and directs the user to the appropriate government entity for details.

The AMA’s timeframe for response to a request for information is clearly indicated during the online ordering process. All profile orders are available for download via the online platform AMA Profiles Hub. Delivery begins immediately upon order submission and completes in a matter of minutes.

4. The user and agency agree upon the format for transmitting credentials information about an individual from the CVO.

AMA Response

The format for transmission of information is the AMA Physician Profile, based on AMA Physician Professional Data. The AMA Physician Profile may be ordered and retrieved in PDF format through an approved, password-protected customer account via AMA Profiles Hub and in XML format via secure and encrypted API transmission. User agrees to such format when ordering and accessing the data in the AMA Profiles Hub. The Profile data is delivered online within minutes.

5. The user can easily discern which information transmitted by the CVO is from a primary source and which is not.

AMA Response

All information on the Profile is gathered from the primary source except a few select data elements that a physician provides: name, address, and self-designated practice specialty. All other information on the Profile—such as US medical school, graduate medical education, board certification, state licensure, NPI, DEA registration, and alert notifications—are obtained and verified directly from the primary source. On the Profile itself, there is a clear separation of non–primary-sourced data and primary-sourced data that is worded as follows: “All information from this point forward is provided by the primary source.”

A complete list of primary sources is provided in response to Principle 10 as well as on the webpage titled AMA Physician Professional Data.
AMA Response
The Profile provides a last reported date on current and historical medical licensure records, ABMS board certification, NPI records, and DEA registration records. This date indicates when the data was last updated to the AMA.

AMA Response
The Profile labels what information is from primary sources; however, in the case of disciplinary actions from medical licensing boards, Medicare/Medicaid, DEA, and other Federal Government agencies, it also states that additional information, not provided on the Profile, is available from the primary source. These statements will only appear if the AMA has received information of a sanction taken by a licensing board, Medicare/Medicaid, DEA, or other Federal Government agencies. The information is communicated on the Profile in statements like the following:

▶ **Medical Licensing Boards**: *ACTION REPORTED.* Contact the state board for [state name].

▶ **Medicare/Medicaid Sanctions from DHHS**: *ACTION REPORTED.* Contact the DHHS or use the DHHS lookup tool at [https://exclusions.oig.hhs.gov](https://exclusions.oig.hhs.gov).

▶ **US DOJ Drug Enforcement Administration**: *ACTION REPORTED.* Contact this agency for additional information.

The AMA certifies that Profile information accurately presents data as it was received from the primary source as of a certain date (e.g., “last reported” data on state licensure and US DEA registration segments).
9. The user can engage the CVO’s quality control processes when necessary to resolve concerns about transmission errors, inconsistencies, or other data issues that may be identified from time to time.

AMA Response

On the AMA Physician Professional Data webpage, the AMA describes the process of obtaining and maintaining data from medical schools, postgraduate medical training programs, medical licensing agencies, licensure and Federal Government sanctions information, board certification data from ABMS, NPI, NBME, and Federal DEA registration data.

The AMA’s commitment to AMA Physician Professional Data data quality is ongoing. The AMA Data Management and Operations Department maintains a comprehensive quality control strategy that utilizes analytical techniques and operations management methodology. Quality control techniques, built into the Department’s business processes, are used to identify and correct quality problems of incoming data submitted by data providers and suppliers. Additional quality controls are employed to monitor, review, verify, and analyze data moving through departmental business processes. Some of these checks and controls are described throughout the AMA Responses to these 10 principles.

In addition to quality checks and controls, the AMA employs a formal discrepancy tracking system to acknowledge the receipt of any potential discrepancies or omissions uncovered by Profiles customers during the credentials verification process. All reported discrepancies are verified with the primary source(s), the profile is updated, if appropriate, and a new profile is provided back to the user. This process is fully automated through the online platform AMA Profiles Hub, making it easy and efficient for Profile customers to submit any perceived discrepancies on the Profile to the AMA.

Lastly, in an ongoing effort to check physician data quality, the AMA contacts more than 350,000 physicians annually. Physicians are asked to review a copy of their credentials and report all discrepancies to the AMA. All reported discrepancies are re-verified with the primary source, and if appropriate, the physician’s record is then updated.

10. The user has a formal arrangement with the CVO for communication of any changes in credentialing information.

AMA Response

A quick view into AMA Physician Professional Data operating procedures for data used to support the physician credentialing process is provided in the following table:
<table>
<thead>
<tr>
<th>Element</th>
<th>Primary Source(s)</th>
<th>Added to File</th>
</tr>
</thead>
<tbody>
<tr>
<td>Birthdate</td>
<td>Medical schools, residency programs</td>
<td>Ongoing</td>
</tr>
<tr>
<td>Current and historical US medical school and enrollment and graduation dates</td>
<td>Allopathic medical school graduation and matriculation reports, osteopathic medical school registrars</td>
<td>Annually</td>
</tr>
<tr>
<td>Current and historical ACGME-approved graduate medical training programs</td>
<td>ACGME — specialty board-approved post graduate medical training programs (completed, incomplete, and in progress)</td>
<td>Annually</td>
</tr>
<tr>
<td>ABMS® board certification (primary board and sub-board)</td>
<td>American Board of Specialties</td>
<td>Weekly</td>
</tr>
<tr>
<td>Current licensure</td>
<td>68 licensing boards</td>
<td>47 boards (monthly)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6 boards (bi-monthly)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>10 boards (quarterly)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4 boards (semi-annually)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1 board (3x per year)</td>
</tr>
<tr>
<td>Licensure disciplinary actions</td>
<td>Licensing boards</td>
<td>16 boards (monthly)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3 boards (bi-monthly)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>14 boards (quarterly)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6 boards (ongoing)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4 boards (semi-annually)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2 boards (semi-monthly)</td>
</tr>
<tr>
<td>Federal DEA registration (expiration date, business activity, drug schedule, payment indicator, last reported date)</td>
<td>DEA</td>
<td>Bi-monthly</td>
</tr>
<tr>
<td>ECFMG applicant number</td>
<td>ECFMG</td>
<td>Monthly</td>
</tr>
<tr>
<td>Name/former name</td>
<td>Various</td>
<td>Ongoing</td>
</tr>
<tr>
<td>Physician’s Recognition Award (PRA)</td>
<td>AMA</td>
<td>Ongoing</td>
</tr>
<tr>
<td>NPI</td>
<td>NPPES</td>
<td>Monthly</td>
</tr>
</tbody>
</table>

Additionally, the AMA offers its Continuous Monitoring Service, in which a Profile user is notified of any changes to the data contained in a physician’s Profile for a two-year period. Should a change occur, the user is sent an updated Profile. The following data elements are monitored under the Continuous Monitoring service:

- Medical licensure
- NPI
- State and federal action notifications
- DEA registration
- ABMS board certification
- Medical school
- ACGME-approved medical training

*Updated: June 30, 2023*
January 1, 2022

To Whom It May Concern:

The American Board of Medical Specialties (ABMS) considers the provision of physician specialty board certification data as an important part of its ongoing mission and views the credentialing process and the credentials verification sub-process as a foundational component of patient safety.

ABMS takes the validity, credibility, reliability and integrity of its primary equivalent board certification data very seriously. The ABMS carefully reviews what products and organizations will be allowed to distribute ABMS board certification data based upon concerns for patient safety and compliance with The Joint Commission, NCQA and URAC accreditation requirements.

Therefore, ABMS has entered into a license agreement with the American Medical Association and designates the products listed below with Official ABMS Display Agent status. The AMA has been designated as an Official ABMS Display Agent since inception of the ABMS Display Agent program in 2004. This designation has been continuous and will remain in force throughout the term of the agreement between ABMS and the AMA. The designation of Official ABMS Display Agent status is subject to continued compliance with program guidelines and is subject to audit by ABMS. The AMA will continue to serve as one of the providers of primary source equivalent ABMS specialty board certification data (self-reported biographical data is not primary source) when such data is delivered through the following authorized products and services and no others when provided in accordance with the requirements of the Official ABMS Display Agent Program. Designation as an Official ABMS Display Agent is made on a product specific basis and which for the AMA currently includes the following products:

1. **AMA Physician Profile**
2. **AMA Masterfile** (for uses approved by ABMS)

As a condition of maintaining its Official ABMS Display Agent designation, the AMA agrees to abide by ABMS guidelines applicable to such designees, which are intended to protect the security and quality of ABMS board certification data.

ABMS specialty board certification data may be considered as Primary Source Verification (PSV) only if delivered from the specific products and services approved for Official ABMS Display Agent status. These products vary in format, features, functionality, intended application and data update frequency. Users of these products should determine the most appropriate sources for their unique needs.

ABMS specialty board certification data may nevertheless be available from other sources that have not been designated as Official ABMS Display Agent sources. ABMS however, is not currently able to validate (according to the minimum safeguards deemed necessary) that these non-designated sources use processes and procedures that are sufficient to maintain the security and integrity of ABMS board certification data.
ABMS recommends that persons or entities using ABMS data, particularly for physician credentialing and privileging purposes or purposes involving patient safety, rely on products and services directly from ABMS or from ABMS licensed products displaying the designation of Official ABMS Display Agent.

ABMS will publish an updated list of Official ABMS Display Agents to accrediting bodies as changes are made to that list.

Thank you for supporting the promotion of quality healthcare in the United States.

Sincerely,

Jennifer Michael
Chief Operating Officer
American Board of Medical Specialties

Inquiries regarding the Official ABMS Display Agent program and other credentialing and business related questions may be directed to:

David Urda
Associate Vice President, Business Strategy & Operations
American Board of Medical Specialties
durda@abms.com
312-436-2674
July 26, 2016

Tammy Weaver  
Director Database Products and Services  
American Medical Association  
330 North Wabash Avenue, Suite 39300  
Chicago, IL 60611-5885

Dear Tammy,

NCQA acknowledges that the American Medical Association uses NCQA-approved sources to verify credentialing information and it maintains this information in the Physician Masterfile. The AMA Physician Masterfile is an NCQA-approved source for verification of:

- Graduation from Medical School  
- Completion of Residency  
- Board Certification  
- DEA Status  
- Medicare and Medicaid Sanctions (effective 7/1/16)

Sincerely,

Patrick Dahill  
Assistant Vice President, Accreditation & Measures Policy
November 18, 2004

To AAAHC-accredited organizations:

Effective March 1, 2005, Appendix J of the Accreditation Handbook for Ambulatory Health Care, published by the Accreditation Association for Ambulatory Health Care (AAAHC) is revised to list the AMA Physician Master Profile as a primary source for verification of a physician's credentials. The Master Profile is accepted for verification of medical school, residency training, board certification, DEA status and Medicare/Medicaid sanctions.

AAAHC is a leading accrediting body for ambulatory health care, conducting surveys of ambulatory surgery centers, physician office practices, endoscopy centers, student health centers, managed care entities and other health care organizations. For more information on AAAHC, please visit our web at www.aaahc.org.

Best regards,

[Signature]

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