

EBCAP Privileging and Credentialing Policy

Background:

Credentialing involves evaluating a practitioner's eligibility to provide clinical services at East Bay Community Action Program (EBCAP) and evaluating the provider's competency for specific clinical privileges. To avoid potential liability for negligent hiring or retention of a provider, EBCAP must exercise due care in selecting providers, supervising them, and reviewing the competency of their clinical activities. Failure to do so may result in liability if a patient is harmed, on the theory that the employer knew or should have known that the provider was incompetent or lacked adequate training and experience, making it foreseeable that his or her performance would be below accepted standards of care. Failure to credential providers in a timely manner can result in denial of payment or reimbursement for services. Thus, an efficient process for credentialing practitioners, and determining that they are competent to provide high-quality patient care, is required.

Policy:

EBCAP must credential all providers prior to placement in the practice and re-credential providers every two years thereafter. All information requested in the application is necessary to complete the credentialing process. The information is based on the standards for credentialing established by the National Committee for Quality Assurance (NCQA) and HRSA's PIN 2002-22.

Current licensing and other credentialing information are maintained by the Human Resources Department for all clinical providers, regardless of level and/or type. Expiration dates are tracked and monitored, and clinicians are provided a reminder approximately two months prior to the expiration date to minimize the chance of a license/certification lapsing. If a lapse in licensing occurs, the clinician will be suspended without pay until the license is renewed through the RI Department of Health. Licensed providers must provide evidence of current/renewed licensure to provide services at EBCAP. EBCAP will also perform a query of the National Practitioner Data Bank for all providers monitored by the NPDB every two years, as well as query the Office of Inspector General (OIG) Database at hire and each year thereafter.

Scope:

East Bay Family Health Care will credential and privilege all Licensed Independent Practitioners (LIP) with whom it contracts or with whom it employs to provide medical, dental or behavioral care, who are permitted by law and the organization to provide care and services without direction or supervision, within the scope of the individual's license, and consistent with individually granted privileges. These include, but are not limited to: doctors (MD, DO), dentists (DDS, DMD), and nurse practitioners (NP, CNS). The determination that an LIP meets the privileging/credentialing requirements shall be

stated in writing by the Health Center's governing board (and/or Personnel Committee), prior to the LIP attending patients. Ultimate approval authority is vested in the governing board which may review recommendations from either the Clinical Director or a joint recommendation of the medical staff and the Chief Executive Officer. Alternatively, the governing body may delegate this responsibility (via resolution or bylaws) to an appropriate individual to be implemented based on approved policies and procedures).

East Bay Family Health Care will credential all other licensed and/or certified providers who provide patient care under direction/supervision with whom it contracts or with whom it employs to provide medical, dental or behavioral care. These include, but are not limited to: certified nurse midwives (CNM), physician assistants (PA), registered nurses (RN), licensed practical nurses (LPN), certified nursing assistants (CNA), licensed independent clinical social workers (LICSW), licensed mental health counselors (LMHC), licensed marriage and family therapists (LMFT), licensed chemical dependency professionals (LCDP), licensed clinical social workers (LCSW), and dental hygienists (LDA). For these non-LIPs, privileging is completed during the orientation process via a supervisory evaluation based on the job description.

All qualified applicants will receive an application for appointment and/or clinical privileges and be processed within a time frame that is specified by EBCAP.

Definitions:

Licensed or Certified Health Care Practitioner: an individual required to be licensed, registered or certified by the State of Rhode Island where EBCAP is located. These individual include, but are not limited to, physicians, dentists, registered nurses, and other required to be licensed, registered or certified (e.g. laboratory technicians, social workers, medical assistants, licensed practical nurses, dental hygienists, nutritionists).

Licensed Independent Practitioner (LIP): physician, dentist, nurse practitioner, and nurse midwife or any other individual permitted by law and organization to provide care and services without direction or supervision, within the scope of the individual's license and consistent with individually granted clinical privileges.

Other Licensed or Certified Healthcare Practitioner: An individual, who is licensed, registered or certified but is not permitted by law and/or the organization to provide patient care services without direction or supervision. Examples included, but are not limited to laboratory technicians, social workers, medical assistants, licensed practical nurses, dental hygienists.

Primary Source Verification: Verification by the original source of a specific credential to determine the accuracy of a qualification reported by an individual healthcare practitioner, Examples include but are not limited to direct correspondence, telephone verification, internet verification, and reports from credentials verification organizations.

Secondary Source Verification: Methods of verifying a credential that are not considered an acceptable form of primary source verification. These methods may be

used when primary source verification is not required. Examples of secondary source verification include: but are not limited to, the original credential, notarized copy of the credential, a copy of the credential (when the copy is made from an original by EBCAP Staff).

Privileging/Competency: The process of authorizing a licensed or certified healthcare practitioner's specific scope and content of patient care services. This is performed in conjunction with an evaluation of an individual's clinical qualifications and/or performance.

Procedures:

It is extremely important to review all documents carefully to ensure completion and accuracy of the information. Failure to provide the specific verification or requested information to EBCAP will delay approval of staff privileges for the practitioner.

Privileging and/or Credentialing is a multi-step process

Step 1: An LIP applicant who requires privileging will receive initial application packet that is specific to his/her clinical license. Privileges are appropriate to the specialty of the practitioner and appropriate for the scope of services that are offered by EBCAP as circumscribed by the facility's license capacity, available medical equipment, and staff.

Step 2: Applicant will return completed application along with requested documents to Human Resources.

Application and supporting documentation will be reviewed and processed by HR staff. While all of the same categories of data will be verified, processes to verify that information may vary, depending upon the clinical license and the availability of third-party vendors (ex. American Medical Association Masterfile, The American Osteopathic Association Masterfile, etc.).

Specifically, privileging/credentialing of licensed independent practitioners (LIPs) requires primary source verification of the following:

- ✦ Graduation from Medical school, residency program, fellowship program
- ✦ Previous and/or current hospital privileges
- ✦ Current unrestricted license to practice in the State of Rhode Island
- ✦ Board Certification (if applicable)
- ✦ Relevant education, training, or experience
- ✦ Current competence (through initial interview, peer review/references, performance improvement data, periodic assessment during employment)
- ✦ Health fitness or the ability to perform the requested privileges (This can be determined by a statement from the individual that is confirmed either by the director of a training program, chief of staff/services at a hospital where privileges exist, or a licensed physician designated by the organization.)

Privileging/Credentialing of LIPs also requires secondary source verification of the following:

- ✦ Government-issued picture identification
- ✦ Drug Enforcement Administration registration (if applicable)
- ✦ Hospital admitting privileges (if applicable)
- ✦ Immunization and tuberculin skin test (PPD) status
- ✦ Life support training (if applicable)

Credentialing of other licensed or certified healthcare practitioners (RN, LPN, Registered Dietitian, Dental Hygienist, Licensed Behavioral Health Specialists, Medical Assistant, and Dental Assistant) requires primary and secondary source verification of the following:

- ✦ Current unrestricted license/certification to practice in the State of Rhode Island

Credentialing of other licensed or certified healthcare practitioners also requires secondary source verification of the following:

- ✦ Education and training
- ✦ Current competence (review of clinical qualifications and performance)
- ✦ Government-issued picture identification
- ✦ Immunization and PPD status
- ✦ Drug Enforcement Administration registration (if applicable)
- ✦ Hospital admitting privileges (if applicable)
- ✦ Life support training (if applicable)

Completed application and materials will be organized and compiled in the applicant's credentials file. Once compiled and reviewed for completeness by the HR Staff, the information for an LIP shall be submitted to EBCAP's Medical Director, and then the EBCAP Personnel Committee of the Board of Directors for review and approval/denial of specific privileges. Once compiled and reviewed for completeness by the HR Staff, the information for a non-LIP shall be filed in HR, and the applicant shall be prepared for hire (subject to all other standard requirements).

Step 3: The completed and verified LIP applicant's packet(s), along with the Committee's recommendations regarding credentialing and clinical privileges are forwarded to the full Board of Directors for informational purposes.

The Board of Directors has authorized the delegation of credentialing, re-credentialing, privileging, and re-privileging of its providers to the Personnel Committee. Any credentialing, privileging, re-credentialing, and re-privileging of EBCAP providers shall be presented to the Board of Directors at the next scheduled meeting or within 60 days.

Providers will be notified in writing of acceptance or rejection within sixty (60) days of completion and full verification of the application and/or request for privileges. If provider's privileges are denied, the reason for the denial will be stated and he/she

will be informed of the appeals process.

RENEWAL OF CREDENTIALS AND PRIVILEGES

The credentials and privileges of LIPs and other licensed or certified healthcare practitioners should be renewed every two years (2) years on or before the anniversary date of his/her start of employment. Similar to the initial granting of credentials and privileges, for LIPs, the necessary information will be forwarded to the Personnel Committee.

Renewal of privileges of LIPs requires primary source verification of the following:

- ✦ Current unrestricted license to practice in the State of Rhode Island
- ✦ Peer review results for the two-year period
- ✦ Relevant performance improvement information

Renewal of privileges for other licensed or certified healthcare practitioners requires secondary source verification of the individual's:

- ✦ competence to perform the duties described in the job description

If a provider's privileges are denied, the reason for the denial will be stated and he/she will be informed of the appeals process.

TEMPORARY CREDENTIALS AND PRIVILEGES

EBCAP grants temporary privileges by the President /CEO and Medical Director for the following reasons:

- ✦ To fulfill an important patient care need, such as when a physician is ill or takes a leave of absence and an LIP must cover his or her practice until he or she returns or
- ✦ when an LIP has the necessary skills to provide care to a patient that the privileged LIP does not.

The decision to grant temporary privileges in such situations is made on a case-by-case basis. The health center must verify the LIP's current licensure and current competence.

When an applicant with a complete application is awaiting review and approval by the Personnel Committee in such cases, temporary privileges may be granted for a limited period of time, not to exceed ninety (90) days. The health center must ensure the following information has been obtained and verified:

Verification of:

- ✦ Complete application
- ✦ No current or previously successful challenge to licensure or registration

- ✦ No history of involuntary termination of medical staff membership at another organization
- ✦ No history of involuntary limitation, reduction, denial, or loss of clinical privileges
- ✦ Current unrestricted license to practice in the State of Rhode Island
- ✦ Relevant training or experience
- ✦ Current competence
- ✦ Ability to perform the requested privileges
- ✦ Other criteria required by the health center
- ✦ Results from National Practitioner Data Bank queries

EBCAP will not grant temporary privileges for other administrative purposes, such as cases in which the LIP fails to provide information or the health center fails to evaluate the information in a timely manner. New providers who are experiencing significant delays in obtaining a DEA license or state-controlled substance license, that provider will work under the supervision of the Medical Director for any prescriptions for controlled substances. Under no circumstances will a provider be allowed to work without a state license. In addition, verbal reference (at least two) must be obtained by the President and CEO or Medical Director.

Discontinuing Appointments and Curtailing Privileges of Providers:

When a report from the Personnel Committee indicates an adverse decision on a provider's privileging, re-privileging, or an action to discontinue clinical privileges, providers are afforded an opportunity for a fair hearing and appellate review in accordance with the provision below:

- ✦ The individual may submit a written appeal, along with new and/or corrected supporting documentation, to the Human Resources Department for reconsideration of the original application.
- ✦ HR staff will present the additional information to the Personnel Committee at its next meeting for additional consideration.
- ✦ Providers will be notified in writing of acceptance or rejection within sixty (60) days by the Personnel Committee.