

**CREDENTIALING AND PRIVILEGING  
OF TELEHEALTH PRACTITIONERS**

**MS 124**

<i>Manual</i>	Medical Staff	<i>Effective Date</i>	01/31/2011
<i>Policy #</i>	MS 124	<i>Date Revised</i>	10/31/2015
<i>Responsible Person</i>	Director, Medical Staff Services	<i>Next Scheduled Review</i>	10/31/2018

**PURPOSE**

The Ronald Reagan UCLA Medical Center (RMC) participates in telehealth programs in which health care services are both delivered and received via telehealth modalities. This policy describes the processes to be followed in the credentialing and privileging of the participating telehealth practitioners to ensure compliance with Centers for Medicare and Medicaid Services (CMS) Conditions of Participation, the California Code of Regulations, Title 22, and The Joint Commission standards.

**DEFINITIONS**

**Telehealth** is the delivery of any healthcare service using telecommunications technology such as interactive audio, video, or data communications between a distant and originating site. Telehealth does not include telephone conversations or emails between healthcare practitioners, patients, and/or healthcare entities. Telehealth also does not include any internal communications between members of the same Medical Staff.

**Originating/Patient Site:** Patient care services via Telehealth where the patient is located at RMC and services are provided remotely by a practitioner who is not currently on the medical/allied health staff at RMC

**Distant/Practitioner Site:** Patient care services via Telehealth where the patient is located at a remote site and patient care services are provided by a member of the Medical/Allied Health Staff at RMC

**POLICY**

Credentialing procedures for the practitioner who will be providing services to a RMC patient will follow Policy and Procedure: MS 100 - Temporary Privileges. Exceptions are made for members of the medical/allied health staffs of the medical centers of the University of California as participants of the UC systemwide program to integrate and leverage practitioners to provide coverage across all the UC Medical Centers. RMC will rely upon the credentialing and privileging information furnished by the UC Medical Centers who follow the procedures stated below.

- A. When in the role of Originating Site, the RMC Medical Staff will credential and privilege by agreement the participants in the telehealth program, accepting the credentialing and privileging decisions made by the Medical Staff of a UC Medical Center.
- B. When in the role of Distant Site, the RMC Medical Staff will credential and privilege practitioners in accordance with nationally-recognized accrediting and regulatory standards. A roster of RMC practitioners participating in the telehealth program will be created and maintained. The originating site may use that roster as evidence of the credentialing and privileging conducted at RMC and can rely on those credentialing and privileging decisions to grant telehealth privileges to the practitioners on the roster. Non-UC entities may request paper copies of relevant credentialing information to assist them in their decision to grant telehealth privileges.
- C. A Telehealth Credentialing and Privileging Agreement will be executed for all patient care activities that are provided as part of the telehealth program. (Exhibit A)

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- D. Telehealth practitioners at the Distant Site are granted telehealth privileges but are not granted Medical/Allied Health Staff membership at the UC- Originating Site. Non-UC entities may choose to also grant Medical/Allied Health Staff membership.

**PROCEDURE**

When RMC Is In the Role of the Originating Site

1. UC telehealth practitioners may be physicians, dentists, podiatrists or advanced practice professionals whose clinical expertise fills a patient care need at RMC. UC practitioners must meet the following requirements in order to be eligible to serve as a telehealth practitioner to patients at RMC:
  - a. If a physician, dentist or podiatrist, must be a member in good standing on the UC Medical Staff of a Medicare-participating hospital.
  - b. Must hold privileges at that hospital that are aligned with the telehealth privileges requested.
  - c. Must hold an unrestricted license, certificate or permit to practice in California.
  - e. Must be eligible to participate in Medicare, Medicaid and other individually sponsored health programs.
2. The RMC Medical Staff will receive a roster of telehealth practitioners from the Medical Staff of the UC Distant Site.
  - a. The RMC Medical Staff will query the National Practitioner Databank, Medical Board of California, and Office of Inspector General website to check for sanctions or disciplinary action.
  - b. Issues raised as a result of these queries will be addressed to the Medical Staff of the UC Distant Site.
3. The RMC Medical Staff Credentials and Executive Committees will consider the roster of telehealth practitioners and will make a recommendation to the Governing Board to grant telehealth privileges. Telehealth practitioners are not granted RMC Medical/Allied Health Staff membership.
4. The RMC Governing Board will grant telehealth privileges to the practitioners on the roster.
5. The process described above will be repeated when a new telehealth practitioner is added to the roster.
6. The RMC Medical Staff Credentials Committee, Medical Staff Executive Committee and Governing Body will recommend and approve the roster of telehealth practitioners at least every two years by the time of the next reappointment date.
7. Information about complaints or adverse events that result from the telehealth services provided should be reported to the UC Distant Site Medical Staff using the Complaints and Adverse Events form (Exhibit A attachment). The Medical Staff of the UC Distant Site is responsible for following its usual process in investigating these events that occur.
8. RMC may choose not to grant telehealth privileges to any practitioner on the UC Distant Site's roster. This action is not reportable to the Medical Board of California and/or National Practitioner Data Bank and does not invoke hearing rights.

When RMC Is In the Role of the Distant Site

1. The RMC Medical Staff will maintain a roster of its members who provide telehealth services to Originating Sites. RMC telehealth practitioners will be Medical/Allied Health Staff members in good standing and will hold the privileges that they will provide via telehealth modalities to the Originating Sites.

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2. The roster will be updated to reflect additions, terminations, and reappointment dates. The roster will be distributed via email as changes are made or monthly. The email message will list the names of the providers who have been added and removed from the roster, as well as the next reappointment date. (Exhibits B and C)
3. The RMC Medical Staff will notify the Originating Sites within five days of any disciplinary action or sanction that limits the practice of a telehealth practitioner.

**APPROVALS**

Medical Staff Executive Committee: 10/29/2015

Governing Body: 10/31/2015

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**EXHIBIT A**

**TELEHEALTH CREDENTIALING AND PRIVILEGING AGREEMENT**

This Agreement is entered into by and between the Medical Staff of Ronald Reagan UCLA Medical Center (“RMC”) and the Medical Staff of XXXX (“FACILITY”).

**RECITALS**

WHEREAS, RMC has established a telehealth program (“Program”) that provides patients and health care professionals at outlying hospitals and clinics access to telehealth services provided by RMC Medical/Allied Health Staff practitioners (“RMC Practitioners”);

WHEREAS, FACILITY has determined that its Medical Staff may rely on the privileging and credentialing decisions made by RMC when granting privileges to RMC Practitioners; and

WHEREAS, FACILITY desires to efficiently credential and privilege RMC Practitioners who provide Program services for the benefit of its patients.

NOW, THEREFORE, RMC and FACILITY agree as follows:

**AGREEMENT**

**Section 1. RMC- ACKNOWLEDGEMENTS AND RESPONSIBILITIES**

- 1.1 RMC confirms that it is a Medicare-participating hospital.
- 1.2 All RMC Practitioners are members of the Medical/Allied Health Staff of the Medical Center, credentialed and privileged in their respective specialty areas.
- 1.3 RMC maintains a roster of RMC Practitioners, which includes each Practitioner’s medical/allied health staff privileges at RMC. Upon full execution of this Agreement, RMC shall send FACILITY identifiable RMC Practitioner information for FACILITY’s National Practitioner Databank query. Within thirty (30) days of the RMC Medical Staff Office’s receipt of notification regarding any change to RMC Practitioner information, RMC shall provide FACILITY with an updated RMC Practitioner list, which shall identify and summarize such change(s).
- 1.4 All RMC Practitioners are licensed in the State or otherwise legally permitted to practice in the State where FACILITY is located.
- 1.5 The RMC Medical Staff credentialing process complies with all of the standards required under 42 C.F.R. § 482.12(a)(1)-(a)(7).

**Section 2. FACILITY- ACKNOWLEDGEMENTS AND RESPONSIBILITIES**

- 2.1 The governing body of FACILITY has chosen to have its Medical Staff rely on the credentialing and privileging decisions of RMC in recommending a physician or other qualified licensed health care provider for Medical/Allied Health Staff privileges at FACILITY.
- 2.2 FACILITY complies with all governing body responsibilities as required under 42 C.F.R. § 482.22(a) [Hospitals] or 42 C.F.R. § 485.616(c) [Critical Access Hospitals].

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- 2.3 FACILITY shall review the list of RMC Telehealth Practitioners who have privileges and are members of the Medical/Allied Health Staff at Ronald Reagan UCLA Medical Center prior to granting privileges to a RMC Practitioner at FACILITY.
- 2.4 FACILITY shall immediately provide specific details regarding any complaints received about a RMC Practitioner and/or any adverse events that occurred by completing the Complaints and Adverse Events form, attached hereto. The Evaluation Form and Adverse Events forms, along with any additional information, shall be sent to the RMC Medical Staff Office for use in its periodic appraisal of the RMC practitioner.
- 2.5 RMC Telehealth Practitioners will not be required to pay Medical Staff dues or fees at FACILITY.

**Section 3. GENERAL TERMS**

- 3.1 This Agreement shall be effective on the last date signed below and shall continue in effect unless terminated in accordance with Article 3.2
- 3.2 Either party may terminate this Agreement with thirty (30) days prior written notice to the other party.

This Agreement constitutes the entire understanding of the parties with respect to the subject matter hereof and supersedes any prior understanding between them, whether oral or written, respecting the same subject matter.

IN WITNESS WHEREOF, the parties have executed this Agreement.

XXXXXXXXXX

Medical Staff  
Ronald Reagan UCLA Medical Center

By: \_\_\_\_\_

By: \_\_\_\_\_

Chief of Staff

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

**Telehealth Professional Practice Evaluation  
Complaints and Adverse Events**

Practitioner Reviewed: \_\_\_\_\_

Date of Review: \_\_\_\_\_

Hospital or Care Setting: \_\_\_\_\_

If the practitioner has been the subject of any complaints and/or adverse events, please report those events on this form.

Date of complaint or adverse event: \_\_\_\_\_

Details of complaint or adverse event: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Overall Impression:**

Acceptable  Marginal  Unacceptable

Reviewer's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Reviewer's Printed Name: \_\_\_\_\_

Forward to: Director, Medical and Professional Staff Services  
Ronald Reagan UCLA Medical Center

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Exhibit B  
Sample Notification Letter and Listing

Date

Name

Address

City, State, Zip

RE: Ronald Reagan UCLA Medical Center (RMC) Telehealth Practitioners

Dear \_\_\_\_\_:

Attached is an updated list of the RMC telehealth practitioners.

Practitioners who provide consultations are members of the Medical/Allied Health Staff at RMC. They are members in good standing, credentialed and privileged in their respective specialty areas at RMC. RMC is a Medicare-participating hospital and follows the standards of the Joint Commission and National Committee for Quality Assurance in credentialing Medical Staff members and assuring their clinical competence to perform the privileges granted at the time of initial appointment and reappointment.

If you have further questions, do not hesitate to contact me at (310) 794-8108.

Sincerely,

Grace Holiday, CPMSM, CPCS  
Director

Encl: List of RMC Telehealth Practitioners

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Exhibit C

**RONALD REAGAN UCLA MEDICAL CENTER  
TELEHEALTH PRACTITIONERS**

As of \_\_\_\_\_

Example

Name	Current Privileges	NPI #	License #	Birthdate	Medical School and Grad Year	Next Reappointment Date
XXXXX	Diganostic Radiology	34589045	G34567	7/24/51	Harvard 1963	10/31/2016
XXXXX	Pediatric Cardiology	7839657	A67385	3/3/63	UCLA 1977	6/30/2017