

## Cumberland Heights Professional Privileges and Credentials Narrative

In order to facilitate the competent practice of independently licensed clinicians at Cumberland Heights, representatives of its clinicians are organized into a Privileges and Credentials Committee. This committee includes members of the disciplines of medicine, nursing, professional counseling, addictions counseling, marriage and family therapy, social work, and pastoral counseling. The individual practice of each contract clinician who wishes to practice independently at Cumberland Heights is reviewed by this group. In addition, professional staff employees who are practicing a specialty within their discipline may be privileged for that specialty (for example, EMDR) Privileges are granted based on competence and current practice rather than by training, licensing or discipline alone.

The **privileging review** consists of primary source verification of professional education, licensure and/or certification, and professional practice and references as to competency in the areas for which privileges are requested. This committee makes final recommendations to the Chief Executive Officer via the Chief Administrative Officer as his designee. Upon approval of the Chief Executive Officer or Chief Administrative Officer as his designee, these recommendations are taken to a representative of the Personnel Committee of the Board of Directors. The representative, acting on behalf of the Personnel Committee, may grant the privileges for two years or deny the privileges. The applying clinician is notified, in writing, of the decision.

During the two year period of privileges, ongoing review occurs through several processes. Weekly review of cases is conducted with the full clinical team in each program. Quality Management staff members conduct random records audits, collect process and outcome data, as well as facilitate specific case reviews by the multi-disciplinary team as appropriate. In addition, an annual competency-based evaluation is conducted by the supervisor for employees. For those disciplines for whom a "peer" is not available in house, outside contracted peer review may also be completed.

Prior to the expiration of the privileges, each privileged clinician is reviewed by the Committee, utilizing the information previously outlined. The Committee again makes recommendations to Executive Management and the Personnel Committee of the Board of Directors who may grant a two year continuance of the privileges or may revoke the privileges. Privileges may also be expanded into additional areas if the clinician demonstrates the relevant education, training, experience, and competency. Again, the clinician is notified in writing of the decision.

Should a decision to deny/revoke privileges occur, the clinician has the right to request a meeting with the Privileges Committee to review the Committee's findings, present additional information, and/or clarify the reasons for the Committee's

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recommendations. It is recognized, however, that the final decision is that of the Personnel Committee of the Board of Directors.

Should a pattern of events or findings or a single event occur that causes the Committee to have concerns regarding a particular clinician's competence or professional behavior, that pattern and/or event is reviewed by the Committee as follows:

- The Quality Management Director and the Committee member of the same discipline as the clinician investigate the pattern and/or event, reporting their findings to the Committee;
- The Clinician is informed of the investigation and is given an opportunity to respond to the Committee as to the specific concerns;
- The Committee then makes recommendations to the Chief Executive Officer via the Chief Administrative Officer.
- Upon approval and/or modification of recommendations, these are presented to the Personnel Committee of the Board of Directors.
- The Personnel Committee of the Board of Directors makes the final decision which is then presented in writing to the clinician by the Privileges Committee.
- Decisions may range from a) no significant findings with continuation of privileges in good standing, b) findings suggestive of further monitoring and/or supervision, including specific conditions to be met and the time frame for same, c) formal sanctioning of a pattern of events/behavior and/or a single event/behavior, including specific conditions to be met and the time frame for same, and d) revocation of privileges to practice at Cumberland Heights.
- The clinician is notified of the decision in writing.
- Should the clinician wish to appeal the decision, s/he may submit a written letter of appeal to the Chairperson of the Personnel Committee of the Board of Directors within five working days of receipt of the Board's decision in writing. The appeal will be discussed at the next scheduled meeting of the Personnel Committee of the Board. The Board shall have complete discretion on any decision and shall notify the clinician in writing of their final decision within five days of the Personnel Committee's meeting.

It should be noted that all proceedings of the Cumberland Heights Privileges and Credentials Committee are confidential to the degree permitted by law. This Committee is considered part of the organization's Quality Management Service and operates under the protection of the 1994 Quality Improvement Act, as well as HIPAA and 42 CFR.