

Cumberland Heights Professional Privileges Narrative

Cumberland Heights' clinicians are organized into a Privileges and Credentials Committee. This committee includes members of the disciplines of medicine, psychiatry, nursing, professional counseling, addictions counseling, marriage and family therapy, social work, pharmacy, therapeutic recreation and dietary science. 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 **initial privileging review** consists of primary source verification of preparatory and continuing professional education, licensure and/or certification, career experience, and professional references. In addition, each clinician must undergo a 90 day period of practice under the supervision of a clinician privileged in the areas for which the clinician is making application--**"temporary privileges"**. During this time, the clinician is required to demonstrate current competence in the skills sets required for the specific privileges requested. This committee makes final recommendations to Executive Management via the Associate Executive Officer. Upon approval of Executive Management, these recommendations are taken to the Personnel Committee of the Board of Directors. The Personnel Committee may grant the privileges for two years, grant conditional privileges for a period of six months, during which time the clinician must work under the supervision of a privileged clinician, or deny the privileges. The applying clinician is notified, in writing, of the decision.

During the two year period of privileges, ongoing peer review occurs through several processes. Weekly peer review of cases is conducted with the full clinical team in each program. Individual supervision is conducted as needed. Quarterly documentation reviews of medical records are conducted by a multidisciplinary group. Quality Management staff members conduct random case reviews, as well as skills observation. Data is also collected in regard to patient satisfaction, event discharges, and unforeseen outcomes. In addition, an annual competency-based evaluation is conducted by the supervisor for employees.

At the two year mark, each privileged clinician is reviewed by the Committee This **renewal of privileges review** includes verification of current licensure and continuing education, quality improvement and utilization review data, any ethical concerns, and observation of current skills competency. 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, may grant conditional privileges for a specified period of supervision under which specific conditions must be met, or may revoke the privileges entirely. 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 condition privileges or 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 recommendation. It is recognized, however, that the final decision is that 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 Executive Management via the Associate Executive 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 with conditional privileges, including specific conditions to be met and the timeframe for same, c) formal sanctioning of a pattern of events/behavior and/or a single event/behavior with conditional privileges, including specific conditions to be met and the timeframe for same, and d) revocation of privileges to practice at Cumberland Heights.

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.