

JCAHO and CMS

Clarification of JCAHO guidelines regarding CMS supervision guidelines was obtained during a recent JCAHO visit to a hospital that employs an RPA . JCAHO regards the RPA to be in the category of Allied Health Professionals (AHP). Previously, JCAHO had an entire chapter in their regulations devoted to credentialing of AHPs, but has since eliminated almost all references to AHPs. The absence of JCAHO regulations allows the facility to develop its own credentialing methodology to meet the needs of the organization.¹

JCAHO referred to the Medicare Carrier's Manual, Transmittal #1725. The Transmittal #1725 refers to the "Ordering of Diagnostic Tests" , initially issued in November 1996, which said all diagnostic tests must be ordered by the treating physician/practitioner. Transmittal #1725 changed the rule and it does not apply to hospital inpatients or outpatients. An order from the treating physician may be taken by fax, phone, email or written communication. The Transmittal letter also states that the radiologist may perform additional procedures "prior to or without the consent of the referring physician, as long as an attempt was made" to contact the referring physician. Additional clarification in #1725 states " radiologic services must be provided only on the order of practitioners with clinical privileges or, consistent with state law, of other practitioners authorized by medical staff and the governing body to order the services."²

JCAHO does not specify or address the supervision requirements of AHPs. In the standards HR.01.02.07 through HR.01.07.01 the facility must demonstrate how the staff will function, qualifications, orientation, education/training, competency and performance evaluation. The credentialing committee and medical staff office must verify the staff qualifications, tasks and responsibilities. It is left up to the health care organization to define the qualifications of staff working with medical equipment.³

Therefore, the supervision level is determined by the credentialing committee, and the CPT code used for billing for a specific procedure. The supervision levels of general, direct and personal do not apply in hospitals or in outpatient facilities related to the hospital. However, they do apply in IDTFs or Independent Diagnostic Treatment Facilities, which would be free-standing imaging centers that are not in any manner affiliated with a hospital.

1. Pybus, Beverly E, and Cairns, Carol, A Guide to AHP Credentialing, 2nd ed. HCPRO, Inc, Marblehead, MA. 2004

2. “Further Clarification on the Ordering of Diagnostic Tests Rule”

www.acr.org/Hidden/Economics Accessed on 1/21/2010

3. JCAHO Standards, HR.01.02.07 - HR 01.07.01 www.jcaho.org Accessed 1/25/2010