

**FORT SANDERS REGIONAL MEDICAL CENTER**

Knoxville, Tennessee

**MEDICAL STAFF  
RULES AND REGULATIONS**

**2020**

Fort Sanders Regional Medical Center  
Medical Staff  
Rules and Regulations

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**RULES AND REGULATIONS  
OF  
THE MEDICAL STAFF  
OF  
FORT SANDERS REGIONAL MEDICAL CENTER**

GENERAL

Upon appointment to the medical staff and as often thereafter as necessary, each member shall arrange for coverage by an alternate staff member for his/her patients in such members absence. In the event the member cannot be reached within a reasonable period of time to manage an urgent problem, the alternate may be called in his place.

I. ADMISSION AND DISCHARGE OF PATIENTS

- A. A patient may be admitted to this Hospital only by members of the Medical Staff. The admitting Staff member shall be considered the attending Staff member. The attending physician is responsible to ensure the patient is seen every twenty-four (24) hours by the appropriate physician. No patient will be admitted without a provisional admission diagnosis. The attending Staff member's name shall appear on the record summary. The attending Staff member is responsible for the care of the patient, unless otherwise documented in the physician's orders (i.e., transfer of service or coverage during the attending physician's absence). The attending Staff member or responsible practice group member will be responsible for completion of the medical record including the diagnosis validation and the discharge summary.
- B. Patients admitted to the Hospital shall be the responsibility of the admitting Staff member or another authorized practitioner. Such practitioner shall be responsible for the medical care and treatment, for the completeness and accuracy of the medical record, for necessary special instructions, and for transmitting reports of condition of the patient to the referring physician and to relatives. Whenever these responsibilities are transferred from one member of the Staff to another, a note to that effect shall be made on the patient's record.
- C. The admission policy is nondiscriminatory. All medically indigent patients shall be admitted by members of the attending Staff, and shall be assigned to the services concerned in treatment of the disease which necessitates admission or treatment. Transfer between the various services may be made in accordance with the judgment of the attending physician on service.

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- D. Physicians admitting patients shall be held responsible for giving such information as may be necessary to assure the protection of other patients and Hospital personnel. Administrative Policy: PC.ED.001 – Duty to Furnish Hospital Services
- E. Patients shall be discharged only by orders of the attending physician, or designated responsible physician. The final diagnosis shall be entered on the chart by the physician within the guidelines of the medical record number reference or approved discharge criteria, except when the diagnosis is unclear due to pending pathology specimen or diagnostic study results. When patients leave against medical advice, the policy for Discharge Against Medical Advice will be followed.
- F. Upon expiration of a patient expiration of a patient, the deceased shall be pronounced dead by his attending physician, the designated physician on call, or the physician who responds to the bedside.

A Registered Nurse (RN) may make the actual determination and pronouncement of death under certain circumstances as outline in hospital policy P.C. N.U. 020.

The physician responsible for the care of the patient shall be responsible for signing the Death Certificate.

No autopsy shall be performed without signed, written consent of the proper relative, or other persons authorized by law to order autopsies. (See II.B.11).

- G. Guidelines for Organ/Tissue Donation at FSRMC are defined to assure the option of organ/tissue donation is provided to the next-of-kin of all potential donors and that FSRMC is in compliance with Tennessee State Law 1140 and the Omnibus Act P.L.99-509. Reference Administrative Policy pC.NU.015 – Organ and Tissue Recovery

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II. Medical Records

*This policy applies to all members of the Medical Staff holding clinical privileges. The policy also applies to advanced practice professionals (APPs).*

I. **General Keeping of the Medical Record**

A. Completion and Signature Requirements

1. The attending physician shall be responsible for the preparation of a complete, legible medical record for each patient.
2. All entries shall be dated, timed and authenticated by the author of the entry.
3. A medical record is defined as complete at the expiration of thirty (30) days post discharge and all required documentation and authentication are present. The medical record is then determined to be a Closed Medical Record.
4. All clinical entries shall be accurately timed, dated and authenticated by signature, identifiable initials, or computer key. A rubber stamp of a printed name may be used to clarify a signature that might otherwise be illegible.

\*No rubber stamp bearing an actual signature may be utilized. This regulation applies to both Inpatient and Outpatient charts and orders.\*

5. A list of unapproved/unacceptable abbreviations is identified below. Other abbreviations may be used. If the abbreviation is unclear, the author is to be contacted and the abbreviation clarified then documented within the record. Please refer to the Covenant Health policy on abbreviations for complete information.

“Do Not Use” Abbreviations include:

<b>Abbreviation</b>	<b>Preferred Term</b>
U (for unit)	“unit”
IU (for international unit)	“international unit”
Q.D. (once daily) Q.O.D. (every other day)	“daily” and “every other day”

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Trailing zero (3.0 mg) Lack of leading zero (.3 mg)	Do not use a zero by itself after a decimal point (3 mg) and always use a zero before a decimal point (0.3 mg)
MS MSO4 MgSO4	“morphine sulfate” or “magnesium sulfate”

B. APP Entries / Patient Care Requirements

1. APP’s may perform daily rounds under the supervision of the physician. Evidence of daily communication between the supervising physician and APP is required in the medical record.

A supervising physician may choose for their APP (NP or PA) to perform daily rounds. The APP will function under the direct supervision of the collaborating physician/group. The phrase “under the direct supervision of a physician” shall be construed as a periodic evaluation and clinically appropriate follow-up of the medical plan of care. Factors influencing the frequency of this evaluation include the patient’s condition during the course of the medical treatment and the patient’s ability to understand his/her care. The supervising physician must be readily available for in person consultation upon the request of any patient under the care of a physician-directed health care team.

2. Supervising physicians are required to co-sign the following APP entries no later than 30 days post discharge, except where noted otherwise
  - a. discharge summary
  - b. history and physical
  - c. consults
  - d. admission order
3. A physician co-signature is not required for APP orders or daily progress notes.
4. APP’s are responsible for completion of their documentation and signature requirements, including their own verbal/telephone orders.

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C. Documentation by Medical Students, Interns and Residents

1. Charting guidelines for these participants are as follows:

	<b>History &amp; Physical Examinations</b>	<b>Progress Notes</b>	<b>Orders</b>	<b>Discharge Summary</b>
<b>Medical Students</b>	Documentation only in electronic student documentation form. This documentation is not part of the permanent record.	Documentation only in electronic student documentation form. This documentation is not part of the permanent record.	Medical students may not place orders.	Documentation only in electronic student documentation form or paper form.
<b>Residents</b>	May perform with follow-up note from attending physician within the next 24-hours	May create with the attending to co-sign on the next visit.	May place orders.	May create or dictate with co-signature required.

D. Administrative Closure of Medical Records

1. No medical staff member shall be permitted to complete a medical record on a patient unfamiliar to him/her in order to retire a record that was the responsibility of another staff member who is deceased or unavailable or other reasons.
2. HIM will make all reasonable attempts to complete every record, however, in the event a provider is no longer available, the record will be administratively closed. The appropriate Committee will be notified of all closed records.

II. Content of the Medical Record

A. The medical record contains sufficient information to identify the patient, support the diagnosis, justify the treatment, document the course and results accurately, and facilitate continuity of care among health care providers. Each medical record contains at least the following:

1. The patient's name, sex, address, date of birth, and the name of any legally authorized representative, allergies to foods and medicines, the patient's language and communication needs.
2. Records of communication with the patient regarding care, treatment, and

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- services, (for example telephone calls or email) if available;
3. Patient-generated information (for example, information entered into the record over the Web or in previsit computer systems) if available;
  4. The patient's legal status, for patients receiving mental health services;
  5. Emergency care provided to the patient prior to arrival, if any;
  6. The record and findings of the patient's assessment;
  7. A statement of the conclusions or impressions drawn from the medical history and physical examination;
  8. The reason(s) for admission or treatment;
  9. The goals of treatment and the treatment plan; Evidence of known advance directives;
  10. Evidence of informed consent for procedures and treatments for which informed consent is required by organizational policy, including explanation of risks and benefits of the procedure/treatment and of the alternatives to the procedure/treatment;
  11. Diagnostic and therapeutic orders, if any;
  12. All diagnostic and therapeutic procedures and tests performed and the results;
  13. All operative and other invasive procedures performed, using acceptable disease and operative terminology that includes etiology, as appropriate;
  14. Progress notes made by the medical staff and other authorized individuals;
  15. All reassessments, when necessary;
  16. Clinical observations, including the results of therapy
  17. The response to the care provided;
  18. Reports of all consultations provided;



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19. Every medication ordered or prescribed for an inpatient;
20. Every dose of medication administered and any adverse drug reaction;
21. Each medication dispensed to or prescribed for an ambulatory patient or an inpatient on discharge;
22. All relevant diagnoses established during the course of care; and
23. Conclusions at termination of hospitalization
24. Any referrals/communications made to external or internal care providers and to community agencies.

B. History and Physical

1. The member of medical staff admitting a patient must assure that a complete and current medical history and a complete and current physical examination of the patient are carried out by an appropriately credentialed practitioner with privileges at this hospital.
2. The history and physical must be created no more than 30 days before the admission, or within 24 hours after admission, or registration, and in any event, prior to any surgery or procedure requiring anesthesia services.
3. H&Ps created within 30 days prior to admission must be updated by an appropriately credentialed practitioner with privileges at the hospital to include an examination for changes in the patient's condition. This update must occur within 24 hours after the admission or registration and prior to any surgery or procedure requiring anesthesia services.
4. Please note that a History and Physical must be signed (or cosigned, as appropriate) by the physician. The physician's signature on the H&P update does not satisfy the requirement for an H & P Update as outlined above. Both must be signed or cosigned.
5. Documentation of the history and physical, completed and updated as required herein, must be documented in the patient's record prior to any procedure involving risk and all procedures requiring anesthesia services.
6. With the exception of emergencies, patients shall not be taken to the operating room unless a compliant history and physical examination report appears in

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the record. In cases of emergency surgery, a brief admission note and evidence that a history and physical examination report has been recorded.

7. The H&P must contain, at minimum, the following:
  - a. chief complaint;
  - b. details of the present illness;
  - c. allergies and current medications, including supplements;
  - d. when appropriate, assessment of the patient's emotional, behavioral, and social status;
  - e. relevant past, social, and family histories;
  - f. pertinent review of body systems;
  - g. appropriate physical exam as dictated by patient's clinical presentation or anticipated procedure to include, at a minimum, a documented examination of the heart and lungs; and
  - h. conclusions or impressions, assessment and plans for treatment.
8. Documentation of informed consent, when applicable and appropriate
9. OB Records
  - a. Obstetrical medical records shall include prenatal information. A durable, legible original or reproduction of the prenatal record is acceptable for use as the H&P, provided the patient has been seen within 30 days of admission.
  - b. If a patient has a scheduled C-section, the H&P update process applies as outlined previously in this policy.
10. Minimally invasive procedures
  - a. Procedures listed in Appendix A do not require an H&P unless anesthesia or moderate sedation is used. Moderate sedation as defined by CMS is a drug induced depression of consciousness during which the patient responds purposefully to verbal commands, either alone or accompanied by light tactile stimulations.
  - b. A post procedure progress note / brief op note must be documented immediately after the procedure and must include:

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- 1) procedure performed
- 2) pertinent findings
- 3) estimated blood loss, if any
- 4) specimens removed, if any
- 5) complications, if any

c. Note that if the full operative/procedure report is created, immediately available and signed immediately after the procedure, the immediate post-op note (aka Brief Op Note) is not required.

11. Recurring 'outpatient in a bed' visits for infusions, transfusions and chemotherapy on stable patients require an updated progress note at a minimum of once per year.

C. Consultation Reports

1. Contain a recorded opinion by the consultant that reflects the examination of the patient and review of the patient's medical record.

D. Operative Reports

1. Must be recorded immediately following the surgical or invasive procedure, before the patient is moved to the next treatment area.
2. Must be recorded by the person who performed the procedure.
3. Shall contain
  - a. the date of the procedure
  - b. preoperative and postoperative diagnoses
  - c. the procedure(s) performed
  - d. a description of the procedure
  - e. findings
  - f. the technical procedures used
  - g. specimens removed, if any

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- h. estimated blood loss, if any
- i. complications, if any
- j. prosthetic devices, grafts, tissues, transplants, or devices implanted, if any
- k. the name of the primary surgeon and any assistants

4. Postoperative Progress Notes / Brief Op Note

- a. In the event the full operative report has not been recorded, a postoperative progress note / brief op note shall be recorded by the surgeon immediately following the procedure and prior to transfer to next level of care. Note that if the full operative report is created immediately after surgery using front end dictation, the postop progress note / brief op note is not needed.
- b. Required elements
  - 1) The procedure performed
  - 2) Description of the procedure
  - 3) Complications, if any
  - 4) Estimated blood loss, if any
  - 5) Findings
  - 6) Specimen(s) removed, if any
  - 7) Name of surgeon and any assistant(s)
  - 8) Postoperative diagnosis

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E. Anesthesia Documentation Requirements

1. Pre-Anesthesia Evaluation

- a. Must be completed and documented by an individual qualified to administer anesthesia, performed within 48 hours prior to surgery or a procedure.
- b. Required elements
  - 1) Pre-procedural education
  - 2) Patient's condition immediately prior to induction of anesthesia.

2. Post Anesthesia Evaluation

- a. Shall be documented by a physician or CRNA qualified to administer anesthesia
- b. Must be performed after the patient's recovery from anesthesia and no later than 48 hours following the procedure
- c. Required elements
  - 1) Respiratory function, including respiratory rate, airway patency, and oxygen saturation
  - 2) Cardiovascular function, including pulse rate and blood pressure
  - 3) Mental status
  - 4) Temperature
  - 5) Pain
  - 6) Nausea and vomiting
  - 7) Postoperative hydration

F. Diagnostic and Therapeutic Orders

1. Must be

- a. Typewritten, computer-generated, or handwritten in ink
- b. Dated, timed and signed by the ordering provider
- c. Clear and legible

2. Verbal and telephone orders

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- a. Should be used only when absolutely necessary
  - b. Must be cosigned within 14 days (current law and regulation) following the 'read back and verify' process.
    - 1) Must be cosigned by either the ordering provider or another provider responsible for the care of the patient.
    - 2) If the 'read back and verify' process is not followed, the orders must be cosigned within 48 hours.
  - c. Please refer to Covenant Health's policy on Telephone and Verbal Orders for complete and detailed information.
3. Other persons listed below may take orders limited to their specific license, training and function.
- a. Physical Therapist
  - b. Physical Therapy Assistant (PTA)
  - c. Occupational Therapist
  - d. Occupational Therapy Assistant (OTA)
  - e. Psychologist
  - f. Respiratory Technologist
  - g. Respiratory Therapist
  - h. Speech Therapist
  - i. Pharmacist
  - j. Radiology Technologist
  - k. Ultrasonographers
  - l. Nuclear Technologist
  - m. Dietitian
  - n. Sleep Techs
  - o. Neuro Techs

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G. Progress Notes

1. Must be recorded by an appropriately credentialed provider on a daily basis or may be documented more frequently based upon patient condition.
2. Shall denote the patient's status, detail of any changes, and the condition of the patient.

H. Discharge Summary

1. Required for all inpatient and observation stays. In the event of a death, a Death Summary/Record of Death serves as the discharge summary.
2. Required anytime the patient stays after midnight due to clinical condition (e.g., after day surgery when clinical condition unexpectedly changes)
3. The provider who writes the discharge order is responsible for the discharge summary.
  - a. When the discharge summary is dictated by the APP, the APP must include the name of the physician who should be flagged to cosign the report.
4. Must be in the record no later than 30 days post discharge

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5. Required elements

- a. Reason for admission
- b. Principal diagnosis
- c. Secondary and chronic diagnoses that are treated/monitored, and whether the condition was new or present on admission
- d. Any complications and co morbidities
- e. Operative procedures performed
- f. Pertinent lab, radiology, test results and physical findings
- g. Course of treatment
- h. Condition at discharge
- i. Disposition
- j. Instructions given at discharge
- k. Final diagnosis without abbreviations or symbols

6. A short stay discharge summary will be accepted for stays of less than 48 hours, provided the stay was uncomplicated. The following elements are required:

- a. Outcome of the hospitalization
- b. Plans for follow up care
- c. Discharge Disposition

I. Coding Queries

1. Coding queries are necessary for complete and accurate coding and core measure abstraction. Unanswered queries are treated like other chart deficiencies. Providers may be suspended if these are left unanswered as addressed under Section III of this policy.

Access to the Medical Record

1. All patient records are the property of the hospital wherein the patient is treated and shall not be removed from that hospital except by court order, subpoena, or



statute and in accordance with Covenant Health's policies.

2. Free access to all medical records of all patients shall be afforded to medical staff members in good standing, their extenders and students for bona fide study and research, consistent with preserving the confidentiality of personal information concerning the individual patients. *Access must be in accordance with Covenant Health's privacy and security policies, and includes only those patients for which the provider has a legitimate treatment relationship.*

### **III. TIMELINESS**

In all cases the medical record shall be completed within 30 days following patient discharge or the physician/provider will be subject to the suspension process. APP's who are delinquent in completing medical records will not be allowed to assist their sponsoring physician(s) in the hospital until all delinquent records have been completed.

#### **A. Notification of Providers**

1. Providers shall be notified of all incomplete medical records on a regular basis, no less than monthly. Incomplete records must be completed prior to the date of suspension in order to avoid suspension of elective admission privileges.

#### **B. Failure to Complete Records – Automatic Suspension**

A suspension for incomplete medical records is considered to be administrative in nature and is not reportable to the National Practitioner Data Bank. This type of suspension is not related to professional competence or conduct that could adversely affect the health or welfare of the patient.

1. Failure to complete records by the suspension deadline results in an automatic administrative suspension of privileges.
2. HIM sends written notification of suspension to the physician's practice by fax or email. The notification includes the requirement for the physician to arrange for appropriate coverage for patients by another medical staff member with like privileges.
3. The automatic administrative suspension includes all admitting privileges and scheduling of any new procedures. The physician on suspension may continue to care for patients currently admitted to the physician's service for up to 15 days

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from the date of suspension. Admissions and procedures that have been scheduled prior to the date of suspension will be honored for up to 15 days after the date of suspension.

4. A suspended physician may continue to take emergency call and admit and care for patients in emergency situations.
5. A physician may not admit patients under the services of another physician or perform surgical or other invasive procedures when he/she is on the suspension list.
6. Reinstatement of these privileges is allowed immediately upon completion of all delinquent record(s). Suspension of these privileges cannot be based upon a minimum or maximum numbers of records to be completed. Any and all delinquent records are expected to be completed.
7. The suspension list will be distributed to the following areas/departments by Health Information Management:
  - Administration
  - Quality Care Management
  - Central Scheduling
  - Chief of Staff
  - Day Surgery
  - Emergency Department
  - Endoscopy Lab
  - Medical Staff Office
  - Outpatient Registration
  - Pre-admission Testing
  - Registration
  - Surgery
8. If a physician has been suspended for a third time in the calendar year, all clinical privileges are automatically relinquished until all delinquent medical records are completed. The automatic relinquishment is not grounds for a fair hearing and is not reportable to the NPDB. (*Refer to Credentials Policy, 6.F AUTOMATIC RELINQUISHMENT*)
9. Reinstatement from the automatic relinquishment may be requested upon completion of all delinquent medical records. The request is to be submitted through Medical Staff Services. Payment of a fine may be required as determined by the MEC.
10. If the physician does not complete all delinquent records within 60 days after the automatic relinquishment is in effect, the matter will be referred to the MEC and may be considered an automatic resignation from the medical staff.

## APPENDIX A

### I. Minimally invasive procedures that DO NOT require an H&P

A. Minimally invasive procedures as listed below do not require a history and physical. An immediate post-procedure progress note should be written to include, at minimum:

1. the name of physician performing procedure,
2. procedure performed, and
3. any other pertinent medical findings or events.

B. Minimally invasive procedures are defined as all:

1. Apheresis
2. Arthrocentesis, joint injections, arthrograms
3. Aspiration
4. Biliary tube change
5. Blood patch
6. Bone marrow biopsy
7. Breast biopsy if no sedation
8. Central venous line, Q Port flush
9. Coronary CTA
10. EEG
11. Epidural steroid injections or diagnostic injections
12. Esophageal motility studies, rectal motility studies
13. Fistulogram
14. Gastrotomy tube replacement
15. Image guided biopsy, image guided drainage, image guided aspiration
16. Labor checks
17. Manometry
18. Myelograms, lumbar punctures
19. Nephrostogram

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20. Nerve root blocks, sympathetic blocks, IV regional blocks
21. Newborn circumcisions
22. Paracentesis, thoracentesis
23. PEG tube replacement
24. Percutaneous transhepatic choangiogram
25. Perma cath removal
26. PFT
27. pH study
28. PICC line placement
29. Pill cam
30. Spirometry
31. Stress test
32. Tilt table test
33. Ureteral stent placement
34. Venogram

**II. Procedures that DO require H&Ps include, but are not limited to:**

- A. Any procedure involving sedation requires an H&P (including radiology).
  - B. Angiogram
  - C. Device implants (e.g., pH probe)
  - D. Heart catheterization
  - E. Chemotherapy, blood transfusions and drug infusions
1. Stable patients receiving any of the above on a regular basis require an H&P or updated progress note once a year.

### III. QUALITY IMPROVEMENT/PEER REVIEW

- A. System Quality Improvement and Professional Relations Committee of the Board has the authority:
1. To act on behalf of the Board of Directors with respect to routine credentialing matters: recommendations of medical staff appointments, revision of clinical privileges, and termination of appointments, subject to the provisions set out in the Medical Staff Bylaws.
  2. To review, monitor and approve the quality of care and quality improvement programs, procedures and mechanisms.
  3. To review the quality of patient care services provided by the system and its medical staff as part of the program to assess and improve quality, to include those physicians who are medical staff members but who do not have an inpatient hospital practice.
  4. To review, monitor and approve safety and risk management policies and procedures.
  5. To assist the board of directors in implementation of the peer review process consistent with the System Medical Staff Bylaws.
  6. To facilitate the board of directors in implementation of the peer review process consistent with the System Medical Staff Bylaws.
  7. To review and establish criteria to ensure appropriate accreditation of each facility by the Joint Commission and other accrediting bodies.
  8. To perform such other functions as may be delegated to such committee by the board of directors from time to time.
  9. The chairman of the Quality Subcommittee of each clinical department is charged with the responsibility to carry out an initial review of a single chart if a matter of concern has been brought to his attention by the Quality Improvement (QI) staff. Only this chairman or his designee can access the chart of a patient not his own for the purpose of an "issue of quality".

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Another physician can be appointed by the subcommittee chairman to perform an initial review if the chairman feels that the case material is outside his area of professional expertise.

QI may be made aware of a request for a chart review through: (1) the Medical Staff Office via the appropriate form; (2) Risk Management (through the submission of an Incident Report); or (3) the Chief of Staff. The notification to QI shall also include the patient's name and medical record number. The chairman of the appropriate departmental Quality Subcommittee shall be advised by QI as expeditiously as possible.

The result of such review will be reported to the Quality Subcommittee at its next regular or called meeting. That body shall: (1) notify the physician of its action and decide; (2) whether or not to submit a report to the chairman of the Professional Review Committee.

Nothing in this policy shall preclude a physician from requesting another physician to review the chart of one of his patients if such request is made in writing. In this circumstance, the physician to whom the letter is addressed is to present the letter of authorization to the HIM staff before being given access to a specific chart.

- B. **Quality Improvement Committee (Q.I.C.):** The Q.I.C. along with the MEC is responsible for quality oversight at Fort Sanders Regional Medical Center. This council consists of the Medical Director of Clinical Quality Improvement, and individuals who represent hospital leadership. Chief of Staff and chiefs-elect are Ad-Hoc members. Quality data, customer satisfaction data, and results of process improvement team activities are submitted to the PIC for evaluation. Coordination of quality-related multidisciplinary activities is a primary responsibility of the Quality Improvement Committee.

**C. PEER REVIEW**

In concurrence with the mission of Fort Sanders Regional Medical Center to produce programs and services of highest quality, the Medical Staff is organized to assess the quality of its programs as well as to evaluate those individuals who have been granted privileges to perform patient care.

The Medical Staff has a leadership role in organizational performance improvement activities. These activities are designed to ensure that when the findings of the assessment process are relevant to an individual's performance; the medical staff is responsible for determining their use in peer review or the ongoing evaluations of licensed individual practitioner's competence. The peer

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review process is responsible for in-depth assessments of an individual licensed practitioner's practice patterns and outcomes. Physician departures from clinical policy should not be interpreted as a breach of good medical practice. Such departures should be weighed individually. During the review process, the physician providing the care should be given the opportunity to clarify the documented details of the clinical care rendered. The goal of peer review should be improvement of patient care through physician education and process improvement. The results of peer review activities are considered in practitioner-specific credentialing and privileging decisions.

The conclusions reached through the peer review process are supported by a rationale that specifically addresses the issues for which peer review was conducted, including as appropriate, references to literature and relevant clinical practice guidelines. In addition to the view of the reviewer, all members of the review committee shall be given the opportunity to express their opinion before conclusions are reached.

Criteria for peer review includes but not limited to:

- Appropriateness of diagnosis and/or treatment;
- Unanticipated outcomes (mortality, readmission, etc)
- Significant departures from established practice patterns;
- Noncompliance with Medical Staff Bylaws an/or Rules and Regulations impacting patient care or regulatory agency requirements;
- Behavioral issues;
- Undesirable trends or practice patterns; request for review from another department, committee or regulatory agency;
- Patient and/or family members complaint about the quality of care.

The criteria for the consideration of external review includes but not limited to:

- Conflicting recommendations from the Medical Staff Quality Committee
- Lack of consensus for a recommendation
- Lack of internal expertise
- Conflict of interest

No physician shall be responsible to review his or her own care. When only one physician in a specialty or sub-specialty is on the medical staff, practice will be reviewed within the expertise of the department. If practice is not within the expertise of the departments questioned, provision will be made to have cases evaluated by an outside expert in the same medical specialty.

The chairman of the Quality Subcommittee of each clinical department is charged with the responsibility to carry out an initial review of a single chart if a matter of concern has

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been brought to the attention of the Quality improvement (QI) staff. Only this chairman or his designee can access the chart of a patient not his own for the purpose of an “issue of quality”

Another physician can be appointed by the subcommittee chairman to perform an initial review if the chairman feels the case material is outside his area of professional expertise.

The Chairman of the Quality Sub-committee may also appoint a Section Chief to perform initial review of cases identified through performance improvement monitoring conducted by the individual section. Any case(s) identified as needing further action will be forwarded to the applicable Department Quality Sub-committee for further evaluation.

The results of such review will be reported to the Quality Subcommittee at its next regular or called meeting. The committee members will make every effort to conduct the review process in a timely manner, and ensure that the process is appropriate. The committee may consider scheduling an additional meeting if more time is needed to conduct peer review or if the volume of cases scheduled to be presented exceeds the allotted time of the meeting.

- Peer review of the clinical performance of the Medical Staff takes place through the Department Chairman and the Quality Subcommittees. The Medical Staff has six (6) quality subcommittees: Medicine, Surgery, Neurosciences, Women's Services, Orthopedics, and Cardiovascular. The Chair-Elect of each medical staff Department shall be chair of the respective Quality Subcommittee. Other members may be asked to serve at the discretion of the Department Chair, the Subcommittee Chair, or the Chief of Staff.

When the Subcommittee has a concern that the standard of acceptable care has not been met, the reviewee is contacted by letter and asked to provide additional information regarding the care provided. The reviewee may also request to respond to the committee's concerns by appearing before the committee. When required, a written response must be submitted to the committee within the time frame specified in the letter. The committee shall: (1) notify the physician of its action and decide; (2) whether or not to submit a report to the chairman of the professional review committee.

Nothing in this policy shall preclude a physician from requesting another physician to review the chart of one of his patients if such request is made in writing. In this circumstance, the physician whom the letter is addressed is to present the letter of authorization to the HIM staff before being given access to a specific chart.

All peer review outcomes are forwarded to the Department and Medical Executive Committee. The peer review conclusions are tracked over time, and the actions based on peer review are monitored for effectiveness.



## **Performance Improvement**

Fort Sanders Regional Medical Center has defined quality as one of its values. Therefore, Fort Sanders Regional Medical Center will utilize principals and tools of quality improvement in daily operations and in planning for new processes and change. Its governing board, medical staff, leadership and staff from all departments and disciplines will work together to improve patient-focused and organizational focused processes and outcomes. The Medical Executive Committee as a committee of the Medical Staff is accountable to the Board of Directors for the overall quality of medical care rendered to patients in the hospital assuring that appropriate ongoing, systematic, objective performance measures of patient care and/or performance improvement are in place. This is accomplished by receiving and acting on the recommendations of the Medical Staff Departments/Quality Subcommittees or the Performance Improvement Council and by reporting of these activities to the Board of Directors.

Each Medical Staff Department is responsible for involving members of the Department in performance improvement activities including the establishment of performance measures used to monitor and evaluate the quality of care provided by the department. Additional responsibilities include:

1. Identification of the important aspects of care in each clinical department and development of criteria and indicators for the purpose of measuring and assessing performance and outcome, including the review of appropriateness of diagnosis and treatment.
2. Analyze data collected for each indicator, reach conclusions, make recommendations and initiate actions to improve performance. When findings relate to the performance of a licensed independent practitioner, the medical staff determines their use in peer review, ongoing monitoring, and the periodic evaluation of the individual's competence.
3. Communicate findings, conclusions, recommendations, and actions taken to the department members and the Medical Executive Committee.
4. Annually assess the effectiveness of actions and document the improvement in patient care.
5. Make recommendations to the Credentials Committee for clinical privileges based on the findings related to performance of individuals with hospital privileges.
6. Participate in Performance Improvement Teams as needed, taking a leadership role in the assessment and improvement of both clinical and non-clinical processes.
7. Participate in the review of the following processes or outcomes:
  - a) Medical assessment and treatment of patients.
  - b) Operative and other procedures that place the patient at risk. Processes measure include:
    - (1) Selection of the appropriate procedure.

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- (2) Patient preparation for the procedure.
- (3) Performance of the procedure and patient monitoring.
- (4) Post procedure care.
- (5) Post procedure patient education.
- (6) Outcomes.
- c) Use of Blood and Blood Components. Processes measure include:
  - (1) Ordering practices.
  - (2) Distribution, handling, and dispensing of blood and blood components.
  - (3) Administration of blood and blood components.
  - (4) Monitoring the effects of blood and blood components on patients.
- d) Medication Use. Processes measured:
  - (1) Prescribing and ordering.
  - (2) Preparing and dispensing.
  - (3) Administering; and
  - (4) Monitoring the effects on patients.
- e) Quality of the Medical Record including timeliness, completeness and legibility of the record.
- f) Utilization and Resource Consumption including appropriateness of admissions and continued hospital stays.
- g) Surveillance, prevention, and control of infections as reported to the Infection Control Committee.
- h) Risk Management activities as reported to the Safety Committee.
- i) Management of the patient care environment as reported to the Safety Committee.  
The 7 plans include:
  - (1) Safety
  - (2) Security
  - (3) Hazardous material and waste management
  - (4) Emergency preparedness
  - (5) Life safety
  - (6) Medical equipment
  - (7) Utility systems
- j) Mortality review, including autopsy results.
- k) Pharmacy activities as reported to the Pharmacy and Therapeutics Committee
- l) Clinical practice patterns including the review of internal and external clinical outcomes data and significant departures from established patterns.
- m) Patient perception of care and services as related to meeting patient needs and expectations.
- n) Participation in the measurement, assessment and improvement of other patient care processes. The processes include, though are not limited to, those related to:
  - (1) Education of patients and families.
  - (2) Coordination of care with other practitioners and hospital personnel, as relevant to the care of an individual patient.

## **CLINICAL PRACTICE GUIDELINES**

Clinical Practice Guidelines (also known as practice parameters, practice guidelines, patient care protocols, standards of practice, and care designs) are evidence-based and have shown to be efficacious within defined patient populations or services. They provide a means to improve quality, assure appropriate utilization of healthcare services, and enhance the value of healthcare services. Clinical Practice Guidelines assist practitioners and patients in making clinical decisions on the prevention, diagnosis, treatment and management of selected conditions. They also serve as an effective way to design or improve process(es) by reducing variance.

### A. Selection Criteria

When evaluating the use of Clinical Practice Guidelines the organization will consider the following:

- ◆ Sources such as the Agency for Healthcare Research and Quality ([www.ahrq.gov/](http://www.ahrq.gov/)), the AMA's Directory of Practice Parameters, Professional Medical Societies and Physician organizations, professional healthcare associations, and local organizations.
- ◆ Modification(s) necessary to support guideline implementation.
- ◆ Whether the guideline(s) can assist the practitioner in making decisions about appropriate health care for specific clinical circumstances.
- ◆ Whether the guideline(s) are based on current professional knowledge and are reviewed and revised periodically.
- ◆ Mechanisms for anticipating and evaluating variation in guideline(s) compliance.
- ◆ Resources necessary for the implementation and evaluation of the guideline(s).

### B. Implementation Criteria

- ◆ The focus diagnoses, procedures, and/or conditions must be identified by organizational leaders, based on accurate, in-depth analysis of available data:
  - Patient population effected.
  - High volume, high cost, high risk, or problem prone data,
  - High variability in processes that require a new design to bring the clinical system under control.
- ◆ The Clinical Guideline/Pathway will be developed by a interdisciplinary team consisting of representatives that provide direct care to the identified patient group;

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- ◆ The Clinical Guideline/Pathway should consider the entire episode of illness, outlining care requirements for each discipline and each level of care, across the continuum.
- ◆ The Clinical Guideline/Pathway will be reviewed and approved by the Medical Staff.
- ◆ After implementation, the effectiveness of the Clinical Guideline/Pathway will be evaluated, and modified as necessary.

D. **Physician Profiles Policy:** Physician profiles are maintained on all physicians who practice at Fort Sanders Regional Medical Center. These files contain results of Quality Improvement activities. **Purpose:** Physician profiles provide information on the physician's clinical and/or technical skills. This information is used at the time of reappraisal for reappointment to the medical staff or renewal/revision of clinical privileges.

Procedure:

1. Physician profiles are located in the Quality Improvement Department. These files are locked at all times. The Director of Clinical Effectiveness is responsible for assuring that confidentiality and access are protected.
2. Authority to access the physician profiles is granted to those with responsibilities related to the assessment of patient care. Those granted access are: the Chief of Staff, the Chairman of the Credentials Committee, the Chief of the Department (to members of his/her department), the individual physician (to his own), the Director of Clinical Effectiveness, and Outcome Coordinators. All other requests must be submitted in writing to Medical Staff Services and must be approved by the Chief of Staff.
3. Confidentiality of physician profiles is protected under Tennessee Code Annotated 63-6-219, which states that the records, forms, and knowledge collected for and/or by individuals or committees assigned to professional review functions in a health care facility are confidential and are not public records and as such are not subject to court subpoena.
4. Information contained in the files is directly related to the following review activities: monitoring and evaluation of patient care (important aspects of care, focused reviews), surgical and invasive procedure review, medical record review, blood usage review, infection control review,

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patterns or trends from complications screening, and unanticipated events, and physician Behavior Report form.

- a. An unanticipated event for purposes of referral to the Quality Subcommittees for their review is defined as follows: An unanticipated event has occurred when the patient's hospital course does not follow its expected path; and as a result the patient expires or requires additional treatments or surgery that were not part of the original plan of care AND the event is not a usual or recognized complication for a given disease process or medical intervention.

No patient-specific event will be entered into a physician's quality file until such has been presented to the appropriate Medical Staff Quality Subcommittee, and a decision to enter such patient-specific information has been made by the physicians comprising said committee. Physicians will be notified of the placement of information from the review of unanticipated events in their files.

- b. Data are reported (when available) as follows:

Blood Utilization: crossmatch to transfusion ratio

Infection Rate for surgeons: attestation by Hospital Epidemiologist

Pre-op/post-op/pathology discrepancies: serious discrepancies will be reviewed and approved for inclusion by the appropriate Quality Subcommittee before being placed in the physician's file. The discrepancy rate will be expressed as the number of discrepancies divided by the number of cases performed by the surgeon.

Complications monitoring: rates or values derived from the complications screening will be reviewed by the appropriate Quality Subcommittee before being placed in the physician's file. Expression of the data is dependent upon the data type.

Unanticipated events: number of events reviewed by the appropriate Quality Subcommittee

C-section rates:

primary rate = number of primary c-section/number of deliveries x 100%

repeat rate = number of repeat c-sections/number of deliveries x 100%

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$$\text{VBAC rate} = \frac{\text{number of successful VBACs}}{\text{number attempted}} \times 100\%$$

Behavior Forms:

Medical Records suspensions: number of times the physician has been suspended from the active medical staff in the preceding calendar year

Medical Records Clinical Pertinence: for each data element, the % deficient is calculated as the number deficient/number of charts screened for that element.

5. Volume data are also included in the physicians profiles: numbers of admissions, number of consults, and number of surgical cases for which the physician is privileged.
6. When an unanticipated event occurs, the appropriate Departmental Quality Improvement Subcommittee proceeds as follows:
  - a. The reviewing physician, or subcommittee chairperson, or designee, summarizes the case findings and recommendations in writing. This summary becomes a part of the subcommittee minutes.
  - b. A letter, written by the subcommittee chairperson, containing case findings, recommendations and an opportunity to respond is sent to the involved physician. The physician is given a specific time period, not to exceed 30 days, within which to respond either in writing or in person to the subcommittee. The letter becomes a part of the subcommittee minutes.
  - c. After receiving the physician's response, or when the response time period has expired, the subcommittee reviews the case again, and determines the action to be taken.
  - d. If the subcommittee decides that no further action is necessary, no entry is made into the physician's quality file.
  - e. If the subcommittee takes action and sends letters to medical staff for informational or educational purposes only with no response expected, the letters are not placed

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in individual files, but retained with the minutes of the subcommittee or committee.

- f. If the subcommittee decides that further action is necessary, the case is referred to the Credentials Committee for investigation and follow-up.
  7. Action taken by the Professional Review Subcommittee of the Credentials Committee, as the result of Quality Improvement review activities, is placed in the physician profile.
  8. Behavior Report Forms and resulting investigation and action by the Professional Review Subcommittee of the Credentials Committee, are placed in the physician profile.
  9. If additional information is requested to be retained in the physician profile, the requestor must receive the approval of the Medical Executive Committee prior to placing this information in the physician profile.
- E. Results of Peer Review - The peer review process uses clinical criteria established by the departmental Quality Improvement Subcommittee, the department, payers, or national trends as the basis for review. Recommendations and action are based on subcommittee consensus. Confidential physician profiles are maintained which document the results of peer review. These profiles are maintained in the Quality Improvement Department, and are used by the Department Chief in the reappointment process. Each department member has access to his/her individual profile at his/her request.

Department members will be asked to serve on Quality Improvement subcommittees of their departments. These sub-committees are responsible for data analysis, chart review, and recommendations to the Chairman regarding Quality Review results.

As circumstances warrant, department members may be contacted by the department chairman or his designee to discuss perceived problems or concerns with clinical practice, attitudes, behavior, accessibility, availability, compliance with rules of membership, or medical records issues of legibility, timeliness, and completion of the patient's record. The department member should expect all issues to be pursued with objectivity and fairness, as well as, effectiveness in the Peer Review process.

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Each department recommends renewal or revision of clinical privileges based on a summary of information in the physician profile.

It is the intent of the Peer Review process to effectively monitor and improve patient care through a fair and objective mechanism.

IV. GENERAL PRINCIPLES OF MEDICAL CARE

- A. All drugs and medications administered to patients shall be those listed in the latest edition of the "United States Pharmacopeia", "National Formulary", or "New Nonofficial Drugs" or those approved for marketing by the Food and Drug Administration. Drugs for investigational use will be handled in accordance with principles developed by the American Hospital Association and the American Society of Hospital Pharmacists. Reports concerning any investigational drug will be submitted as required by the Food and Drug Administration. Investigational drugs need to be approved by the IRB. Reference: Administrative Manual RR.ET.002 – Clinical Reserach Involving Human Subjects.
- B. All orders for medications and treatments shall be recorded by the responsible physician, dentist or consultant, signed, dated, and timed. Verbal orders shall be dealt with as in:
  - II. Medical Records
    - B. Content of the Medical Record
      - 14. Diagnostic and therapeutic orders -
- C. At the time of operation all previous orders are cancelled.
- D. Psychiatric and/or mental health consultations and treatment will be requested for all patients who have attempted suicide or have taken a chemical non-alcoholic overdose unless the patient refuses in writing or unless mitigating circumstances are outlined in writing in the chart. Mental health consultations in such situations may be performed by Psychologists, Master's of Social Work, and Psychological Examiners licensed by the Board of Healing Arts of the State of Tennessee and credentialed through the Medical Staff. They may be permitted to exercise privileges only under the direct supervision of physician Staff members. - Reference: Suicide Precautions ECSF.015 - Members in good standing of the Medical Staff.



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V. SURGERY

Reference: Department of Surgery Rules and Regulations

VI. EMERGENCY DEPARTMENT AND EMERGENCY SERVICES

- A. The Emergency Department shall be staffed by a qualified physician(s), and a registered nurse(s) at all times, and such assistants as may be required.
- B. Each clinical department and its specialty services shall maintain a separate duty roster for emergency care. The rosters shall be submitted to the nurse supervisor in the Emergency Department and shall be posted in the Emergency Department.
- C. Each clinical department shall be responsible for providing their own call roster and will be maintained by Medical Staff Services and submitted to the Emergency Department.
- D. It shall be the responsibility of the assigned physician to notify the registered nurse in the Emergency Department of any change from the posted duty roster, and the nurse will change the schedule accordingly. If an assigned physician cannot be located, the nurse will act in the following manner:
  - 1. Call the Chairman of the affected department who shall provide medical coverage.
  - 2. Call the Chief of Staff.
  - 3. Call the Administrator on call.
- E. A copy of the Rules and Regulations concerning the Emergency Department and Emergency Department service shall be available in the Emergency Department.
- F. Emergency Department records must contain sufficient clinical information, treatment data, and follow-up instructions, and condition of patient on discharge, as to allow easy transferability of the patient from one physician's care to another's.
- G. If a patient's medical condition, as determined by the qualified evaluator, necessitates an on-call physician to come to the hospital to evaluate/treat the

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patient, it is expected, under most circumstances, that the on-call physician will come to the hospital and evaluate the patient in a timely manner. It is acknowledged that events beyond the control of the on-call physician can prevent a timely response and further, the patient's medical condition may not require a timely response. Therefore, any alleged untimely response by an on-call physician will be reviewed in light of any extenuating circumstances and the patient's medical condition.

H. If any individual, whether or not eligible for Medicare benefits and regardless of ability to pay, comes by him or herself or with another person to the emergency department and a request is made on the individual's behalf for examination or treatment of a medical condition by qualified medical personnel, we must provide for an appropriate medical screening examination within the capability of the emergency department, including ancillary services routinely available to the emergency department, to determine whether or not an emergency medical condition exists. The examination will be conducted by individuals determined qualified by hospital bylaws or Rules and Regulations and privileged to perform medical screening examinations.

I. The screening of individuals seeking emergency medical care in the Emergency Department for the purpose of determining whether the individual has an emergency medical condition that requires stabilizing treatment, shall be done by the Emergency Department physician, or by an appropriately credentialed Physician Assistant and/or Nurse practitioner, privileged to perform medical screening examinations, working within the practitioner's approved scope of practice under the supervision of the Emergency Department physician. In the case of pregnant patients in possible labor, the medical screening examination shall be done by registered nurses with special competence in obstetrics, in consultation with an obstetrician.

J. **DIRECTOR OF EMERGENCY SERVICES**

Emergency services will be under the direction of one individual who is a qualified doctor of medicine (MD) or doctor of osteopathy (DO). The director will be an active member of the medical staff with unrestricted privileges in emergency medicine; of good reputation and character, including physical and mental health and emotional stability; and the ability to work harmoniously with others sufficiently so that the medical staff will be able to operate in an orderly and civil manner.

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VII. SUSPENSION OF ADMITTING PRIVILEGES

Reference: Medical Records and Bylaws

VIII. DELINEATION OF PRIVILEGES

The delineation of privileges forms to apply for clinical privileges are filed in Medical Staff Services and updated at reappointment by the Medical Staff Departments.

IX. COMMITTEES

- A. Present standing committees are: Credentials (including a Professional Review Subcommittee) and Medical Executive Committees.
- B. Staff Committees, to include but not limited to Infection Control, Nominating, Oncology, Operating Room, and Pharmacy and Therapeutics, shall be appointed by the Chief of Staff and all committees shall be reappointed every one or two years, provided that the persons appointed to a committee shall continue to serve until their successors are appointed. Unless otherwise specifically provided herein, the Chief of Staff shall appoint the Chairman of all Staff Committees.

X. MEDICAL STAFF WELLNESS COMMITTEE

**Policy**

The term “impaired professional” is used to describe the practitioner who is prevented by reasons of illness or other health problems from performing professional duties at the expected level of skill and competency. In some contexts, impairment also implies a decreased ability and/or willingness on the part of the affected individual to acknowledge the problem or to seek help to recover. Clearly, such a situation places the professional at risk, and may pose an actual or potential risk to public health and safety.

Fort Sanders Medical Center, in participation with its medical staff has instituted an Impaired Professional Program. The purpose of the program is to educate hospital leaders, medical, allied health and clinical staff about licensed independent practitioner health, address prevention of physical, psychiatric, or emotional illness, and to facilitate confidential diagnosis, treatment and rehabilitation of licensed independent practitioners who suffer from a potentially impairing condition. The goal of this program is assistance and rehabilitation, rather than discipline, and to aid licensed independent practitioners in retaining or regaining optimal professional functioning, consistent with protection of

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patients. Fort Sanders Regional Medical Center has formed a Professional Wellness Committee to coordinate the assistance provided to impaired professionals. The Professional Wellness Committee is composed of six (6) members of the active medical staff, holding a six (6) year term, with two (2) members rotating off the committee, then adding two (2) more every two (2) years. Any ex-officio member may be asked to participate as needed. The committee will report to the Medical Executive Committee. These physicians are experienced and interested in dealing with issues of professional impairment.

The Professional Wellness Committee shall periodically review educational resources and opportunities available to hospital administration, staff, and employees regarding impaired or disabled LIPs, and/or devise its own educational resources, for the purpose of promoting the use of such resources by hospital administration, staff and employees with the goal enabling all hospital professionals to recognize potential **LIP** impairment issues or problems, and to appropriately report or refer identifiable impairment problems pursuant to this policy.

The committee members will be responsible to provide education regarding healthcare professional impairments. Education will:

- A. Be provided on an annual basis during one of the regularly scheduled General Staff meetings
- B. Be provided in written format at time of initial appointment and reappointment to the medical staff
- C. Include issues related to licensed independent practitioner health, prevention of physical, psychiatric and/or emotional illness and the general components of the Impaired Professional Program

Elements of the program

1. Education of organizational leaders and the medical staff about illness and impairment recognition issues specific to licensed independent practitioners:
  - A. The hospital will sponsor an annual educational program regarding illness and impairment issues.
  - B. Licensed independent practitioners will be issued written information regarding illness and impairment issues at time of initial appointment and reappointment to the medical staff
  - C. The education will include:
    1. At-risk criteria
    2. Signs and symptoms in identification of the impaired healthcare provider
    3. Management of the affected healthcare provider

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2. Referral to the Professional Wellness Committee:
  - A. Licensed independent practitioners will be allowed to self-refer to the program
  - B. Referrals of licensed independent practitioners will be allowed by any member of the organization
    1. Referrals can be made on a confidential basis
3. The affected licensed independent practitioner will be referred to the appropriate professional internal or external resources for evaluation, diagnosis and treatment of the condition or concern
4. The confidentiality of the individual referred to the Professional Wellness Committee or the LIP seeking referral, will be strictly maintained with the following exceptions:
  - A. State and federal regulatory limitations (if applicable)
  - B. Ethical obligations
  - C. When maintaining confidentiality threatens the health and/or safety of a patient or patients

In all instances, every effort to protect the confidentiality of the individual referred for assistance will be made.
5. All complaints, allegations or concerns regarding the potential impairment of a licensed independent practitioner will be thoroughly investigated and evaluated for validity.
6. The affected licensed independent practitioner will be monitored until the rehabilitation or any disciplinary process is complete, to assure the safety of the patient population under his/her care.
  - A. Method of monitoring will be determined by the Professional Wellness Committee and the Physician Advisor of any external **resource which may be** utilized.
  - B. Monitoring will continue until the Professional Program Physician Advisor is able to verify that the impairment for which the licensed independent practitioner was referred to the program:
    1. No longer exists
    2. No longer impacts the quality of patient care provided by the licensed independent practitioner
  - C. Periodic monitoring may be conducted on a specific practitioner if deemed necessary by the Professional Wellness Committee and the Physician Advisor
7. Reporting to the medical staff leadership instances in which a licensed independent practitioner is providing unsafe treatment
  - A. Any individual within the organization has the responsibility to report concerns regarding unsafe treatment by licensed independent practitioners

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- B. Reports should be made directly to the licensed independent practitioner's service chief or department chairperson
- C. Reports may also be made to the Chief of Staff
- D. Reports of this nature are to be kept confidential and will follow the routine medical staff evaluation process
- E. The informant has the right to request and receive confidentiality regarding the referral

Procedure

It is the policy of Fort Sanders Regional Medical Center that referrals of impaired LIPs be made to the Professional Wellness Committee, who in conjunction with appropriate professional internal or external resource(s) will arrange for assessment, treatment, support and monitoring to facilitate recovery and appropriate return to work.

All professional employees and medical staff members are strongly encouraged to express concern about an impaired LIP and to make a referral by contacting the Professional Wellness Committee in the hospital. Medical staff members who are concerned about their own status are encouraged to self-report to the Professional Wellness Committee. Any member of the Committee receiving a report or referral shall report the concern to the Committee as a whole, which shall then make an evaluation whether the concern is a credible one warranting further review. If the concern is found not to be credible, no further reporting or proceedings shall occur. If the concern is determined to be credible, the concern will be handled in the following manner:

1. The committee will ask the referral source to have others who may have relevant information contact a member of the committee. The committee does not conduct formal investigations, but rather serves as the recipient of information from concerned colleagues and other sources. The committee will consider each case by reviewing the documentation available and conducting interviews where appropriate.
2. It is the policy of the Professional Wellness Committee not to disclose the source of referrals to the physician in question. Except for reports required or consultations permitted under this policy, all proceedings of the Professional Wellness Committee shall be confidential, and subject to the privileges of the Tennessee Peer Review Law.
3. The Professional Wellness Committee will collect whatever information is readily available concerning the problems and will contact the appropriate resource(s) to discuss ways in which to proceed.
4. The Professional Wellness Committee, where appropriate, will do the following:
  - a) Encourage the LIP to seek assessment and/or treatment services-

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- b) Contact the Medical Executive Committee and/or the Chief of Staff-if the impaired practitioner has entered into a recovery agreement. Notification is also given if the committee has failed to successfully engage the LIP in an appropriate assessment/treatment/recovery program and the committee believes that impairment exists.
- c) Confirm the LIP's cooperation with treatment and recovery activities.
- d) Make efforts to assist the LIP to continue in his or her professional duties to the extent that the practitioner is considered able to do so.
- e) Write an agreement for monitored recovery that refers to the treatment/recovery program. This agreement requires continued compliance with the program.
- f) In cases where the LIP has discontinued or limited work, aid him or her to return to work as soon as possible with the approval and cooperation of both the committee and the appropriate resource.

The Professional Wellness Committee will be responsible for monitoring the effectiveness of the impaired LIP's treatment plan in conjunction with the appropriate resource. When the Professional Wellness Committee considers the LIP to be able to re-enter the practice and knows the LIP is enrolled and actively participating in the monitored recovery plan, the CAO, Chief of Staff and the Medical Executive Committee will be so notified.

If the LIP is unable to demonstrate involvement in a recovery process, or violates the agreement with the appropriate resource or with the hospital, the committee will so notify the Medical Executive Committee for formal action in accordance with the medical staff bylaws. Having done so, the committee will remain available to assist in a recovery plan if the LIP agrees to participate. Any further action against the LIP will be the responsibility of the Medical Executive Committee in accordance with the bylaws.

All licensed independent practitioners are eligible for participation in the Impaired Professional Program.

#### XI. UTILIZATION PEER REVIEW POLICY AND PROCEDURE

The Medical Staff has a leadership role in organizational performance improvement activities. These activities are designed to ensure that when the findings of the assessment process are relevant to an individual's performance; the Medical staff is responsible for determining their use in peer review and the ongoing evaluation of the licensed individual's competence.

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**Purpose:** In compliance with the Medicare Condition of Participation requirements, the UR Committee exists to assist in physician advisor interventions relative to utilization and resource consumption, discharge delays, and analyze approved data and trends to provide comparative data in assisting the evaluation of the licensed independent practitioner's practice patterns.

**Policy:** The Clinical Effectiveness Department of Fort Sanders Regional Medical Center will provide a systematic approach to the evaluation and delivery of patient care through the Case Management and Quality (Clinical Effectiveness) program. Individual cases meeting the criteria for additional review will be forwarded to the Utilization Review Committee and through the appropriate Medical Staff Departmental Quality Subcommittee, in accordance to the Medical Staff Rules and Regulations.

**Criteria for Peer Review** (includes but is not limited to):

- Failure to meet admission or level of severity criteria established by payors<sup>1</sup>
- Failure to meet continued stay criteria established by payors
- Delays in the provision of services

**Procedure:**

1. The Case Manager identifies a case not meeting criteria and documents actions taken in the medical record with an initial confidential Query sheet or the Clinical Effectiveness Communication Worksheet (from Utilization Management) for physician feedback.
2. Case referred to the Director of Clinical Effectiveness. Cases are either trended or referred for peer review through the U.R. Committee process. All cases are entered into the HBOC UM database.
3. Cases identified for peer review are presented to the appropriate Medical Staff Quality Improvement Subcommittee for discussion as designated by the U.R. Committee.
4. Committee recommendations and actions will be documented on the Utilization and Resource Management Peer Review Form and will be maintained in the individual physician's Quality Profile.
5. All Peer review outcomes are forwarded to the Department Chair of the relevant service line/department and then to Medical Executive Committee if appropriate.
6. Peer review findings are tracked over time, and actions based on physician peer review findings are monitored for effectiveness.

Information concerning individual licensed independent practitioner's efficiency of clinical practice patterns is privileged and confidential. Peer review is protected by the Healthcare Quality Improvement Act (HCQIA-Title IV of Pub.L. 99-660) and Tennessee Code 63-6-219.

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<sup>1</sup> Milliman & Robertson and InterQual Criteria (as defined in The Utilization Management Plan PI.CM.004]).



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XII. Self-prescribing and Treatment of Immediate Family Members

Self-prescribing:

- 1) A physician cannot have a bona fide doctor/patient relationship with himself or herself.
- 2) Only in an emergency should a physician prescribe for himself or herself schedule IV drugs.
- 3) Prescribing, providing, or administering of schedule II and III drugs to himself or herself is prohibited.

Immediate Family Members:

- 1) Surgical or non-surgical treatment of immediate family members should be reserved only for minor illnesses or emergencies.
- 2) Appropriate consultation should be obtained for the management of major or extended periods of illness.
- 3) No schedule II, III or IV controlled substances should be dispensed or prescribed except in emergency situations.
- 4) Records should be maintained of all written prescriptions or administration of any drug.

XIII. INAPPROPRIATE BEHAVIOR POLICY

**FORT SANDERS REGIONAL POLICY ON INAPPROPRIATE BEHAVIOR**

**GENERAL POLICY OBJECTIVE**

It is the policy of this Hospital and its governing board that all individuals within its facilities, and all individuals engaged in activities on behalf of the Hospital or Hospital patients should be treated courteously, respectfully, and with dignity. It is the objective of this Hospital to provide optimum care for Hospital patients and to prevent and eliminate inappropriate conduct that may disrupt Hospital operations and/or interfere with optimal patient care.

**POLICY REQUIREMENTS**

All health care practitioners and employees of health care practitioners exercising clinical privileges in this Hospital shall refrain from engaging in "inappropriate behavior" as defined by this policy. Individuals who are employed by the Hospital shall be governed by comparable personnel policies applicable to employees and not by this policy.

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No employee of the Hospital, no medical staff appointee or employee of a medical staff appointee, shall be subject to sanction or discipline for reporting instances of “inappropriate behavior” to the any member of Hospital management, Medical Staff Department Chairman, or Chief of Staff as long as such reporting is done confidentially and without further publication or discussion of the report to others, except to the extent necessary to prevent recurrences or to protect the safety of any individual on Hospital premises. Instances of violence, threats of violence, carrying weapons, and/or intoxication shall be reported immediately to Hospital Security as well as the CAO and Chief of the Medical Staff.

**DEFINITION OF “INAPPROPRIATE BEHAVIOR”**

“Inappropriate offensive behavior” subject to this policy shall mean any one or more of the following:

1. Sexual or other harassment of an individual or individuals, meaning behavior directed toward any individual or individuals that is based on race, color, religion, sex, pregnancy, national origin, age or disability.
2. Violence, meaning behavior intended to cause harm to either person or property or behavior bearing a substantial possibility of causing such harm, whether intended or not.
3. Threats of violence.
4. Carrying weapons.
5. Alcohol intoxication or use of any illegal drug or inappropriate use of controlled substances while on hospital property.
6. Inappropriate and disrespectful verbalization with respect to an individual or individuals.

**PROCEDURE**

The policy dealing with physician behavior (hereafter called: Behavior Policy”) is to be used only for behavioral issues. The existing Professional Review Committee is to be used as the forum for behavioral related issues. Reports kinds may be submitted by (1) the chair of the Professional Review Committee, (2) the department chair, (3) the chief of staff, or (4) the chief administrative officer. That committee will determine whether an issue is significant enough to warrant further evaluation and formal investigation.

Any physician or employee may report concerns regarding inappropriate physician behavior. Employees should direct such concerns to their Manager, or House Supervisor, if the Manager is not available. Physicians should contact the Chairman of the appropriate Medical Staff Department. Concerns expressed by a patient or visitor should be directed to the Manager where the patient is receiving care, or the Hospital Patient Representative, who should in turn contact the Manager. The response process to perceived inappropriate physician behavior should be promptly initiated by the individuals designated above (Manager, House Supervisor, or Medical Staff Department Chairman). Confirmed reports of such grievances should be addressed as presented above. In addition to the informal sharing of concern regarding “inappropriate

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physician behavior”, a formal report may also be filed following this policy using the “Unified Behavior Reporting Form”.

Nothing herein shall prohibit collegial or informal attempts to address “inappropriate behavior”. The individual receiving the grievance (Manager or member of the Medical Staff) should facilitate discussion with the physician involved to resolve the issue. The individual who reported the grievance should be informed that his/her concern has been addressed and encouraged to inform the individual handling the grievance of any future concerns.

If the Professional Review Committee determines that a credible complaint warranting evaluation has been filed the physician so reported will be notified. After evaluation, a meeting will be held with the physician, the chairman of the Professional Review Committee (chief-elect of the medical staff) and the chairman of the appropriate clinical department. The discussion between the department chief, the chairman of the Professional Review Committee and the physician is to be collegial and limited to the facts as reported. The physician will be informed that any inappropriate conduct must cease. A report of this meeting will be filed in the physician’s Quality file. The physician will have the opportunity to file a written rebuttal, which will also be placed in his Quality file. In most instances, this initial approach should be collegial and is designed to be helpful to the physician and the Hospital; however, depending on the severity of the behavior; a more serious and formal approach may be needed. After this discussion, the matter is closed unless further written reports are received. Information placed in a physician’s Quality file remain until the time of his/her next reappointment at which time they are destroyed unless, at the discretion of the then chairman of his/her department, such information is felt worthy of trending or otherwise preserving. All such files are protected under the provisions of peer review and are regarded as confidential.

If another grievance is reported, either through the hospital or medical staff, the following procedure is to be followed. If submitted by hospital staff, the chief nurse executive is to receive the written report, if by the medical staff, to the chairman of the Professional Review Committee via the Medical Staff Office. In either event, the report is to be forwarded to the Professional Review Committee. The chief of staff is then to be notified. The Professional Review Committee will discuss this new complaint and if warranted, the chairman of that committee and the chief of the appropriate clinical department will again meet with the physician. This meeting constitutes a more serious step than the previous meeting. The physician is again reminded of his/her responsibilities and the specific behavior(s) and event(s) are discussed. A firm understanding must be assured by the physician re: his obligations to not engage in inappropriate behavior(s). This understanding is documented by letter to the physician and a copy of the report of the meeting and the letter to the physician are both placed in the physician’s Quality file. The physician is again informed that he/she may write a letter of rebuttal, which is also placed in his/her Quality file. If there are no further reports, no further action is required.

At its discretion the Professional Review Committee may decide that a reported behavior is sufficiently egregious to warrant reporting same to the Credential Committee, even after only a

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single event. The Credentials Committee will then determine what action to take under the Medical Staff Bylaws. This same approach may also be elected after repeated episodes of disruptive behavior.

Violations of this policy shall be dealt with in accordance with the Medical Staff Bylaws. However, repeated instances of “inappropriate behavior” shall be deemed grounds for precautionary suspension, and removal from the premises, under the authority of the Bylaws.

The “Unified Behavior Reporting Form” is to be used in all instances where inappropriate/disruptive behavior is formally reported, whether of or by members of the hospital or medical staff. Such reports filed by employees, patients, or family members are deposited in the office of the Chief Nurse Executive. Those submitted by members of the medical staff are deposited in the Medical Staff Office. In all instances, confidentiality is preserved. Incident reports are not to be used to report behavioral issues.

Documentation of disruptive conduct is critical since it is ordinarily not one incident that leads to disciplinary action, but rather a pattern of inappropriate conduct. The documentation should include:

1. Date and time of questionable behavior.
2. If the behavior affected or involved a patient in any way, the name of the patient; filing a copy of the “Behavior Report Form” with Rick Management as well.
3. The circumstances which precipitated the situation;
4. A description of the questionable behavior limited to factual, objective language as much as possible;
5. The consequences, if any, of the disruptive behavior as it related to patient care or hospital operations;
6. Record of any action taken to remedy the situation including date, time. Place, action and name(s) of those intervening.

Documentation of all grievances related to inappropriate behavior of physicians should be submitted to the Medical Staff Services office. The Medical Staff Services personnel shall promptly notify the Chairman of the Professional Review Committee. In addition, documentation of any complaint of employee harassment (definition “1”, of this policy) must be submitted to the Hospital’s Human Resources department.

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XIV. NEW DEVICE POLICY

Purpose: To provide a consistent process for the introduction of new devices or procedures into the hospital environment, such that clinical, financial, and quality outcomes can be maximally assessed and positively influenced.

Requirements: Surgeon to notify Medical Staff Office (MSO) and/or Chairman of Credentials Committee if new procedure is planned. If request is for new supply, equipment (including implanted device), or instrumentation surgeon is to contact Surgery Department Director or Manager. Factors in decision include whether procedure/device is consistent with strategic plan of Covenant Health and FSRMC. Decision re; new procedure additionally requires determination of whether proposed procedure is consistent with surgeon's existing privileges and may require input from physician chair of clinical department and Credentials Committee. The process requires a minimum of two weeks for new supply. Equipment and instrumentation is dependent upon availability of product and financial constraints. Decision regarding privileges may also require at least two weeks.

Tasks: (to be done in sequence)

1. Surgery Department (or Invasive Laboratory-e.g. cardiac cath lab; endoscopy lab)

- notify MSO of the new procedure if applicable
- provide MSO name of surgeon & date requested to perform
- notify Finance Office if applicable
- obtain pertinent information from surgeon
- procedure name
- equipment &/or instrument requirements
- provide pass through codes/CPT 4 or ICD9 codes if known
- training needs of staff determined and addressed
- vendor name

2. MSO

- verify credentials
- notify Finance Office

3. Finance Office

- investigate financial feasibility
- confirm if consistent with Strategic Plan
- research reimbursement & assign appropriate codes
- initiate charging process for supplies if applicable

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4. Possible Conference

- MSO
- CFO or representative
- Director of surgery/invasive laboratory (or representative)

5. Surgery/Invasive Laboratory/Medical Staff Office

- notify requesting surgeon/physician of decision
- initiate charge process when appropriate
- input correct charge codes if applicable
- verify if equipment, supplies, &/or instrumentation is available
- notify coordinator
- create or update Doctor Preference Card

XV. DIRECTOR OF ANESTHESIA SERVICES

Anesthesia services will be under the direction of one individual who is a qualified doctor of medicine (MD) or doctor of osteopathy (DO). The director will be an active member of the medical staff with unrestricted privileges in anesthesia; of good reputation and character, including physical and mental health and emotional stability; and the ability to work harmoniously with others sufficiently so that the medical staff will be able to operate in an orderly and civil manner.

XVI. DIRECTOR OF RESPIRATORY CARE/CRITICAL CARE SERVICES

Respiratory/Critical Care services will be under the direction of one individual who is a qualified doctor of medicine (MD) or doctor of osteopathy (DO). The director will be an active member of the medical staff with unrestricted privileges in internal medicine with critical care training, or pulmonary medicine; of good reputation and character, including physical and mental health and emotional stability; and the ability to work harmoniously with others sufficiently so that the medical staff will be able to operate in an orderly and civil manner.

XVII. DIRECTOR OF NUCLEAR MEDICINE SERVICES

Nuclear Medicine services will be under the direction of one individual who is a qualified doctor of medicine (MD) or doctor of osteopathy (DO). The director will be an active member of the medical staff with unrestricted privileges in radiology with nuclear medicine privileges; of good reputation and character, including physical and mental health and emotional stability; and the ability to work harmoniously with others sufficiently so that the medical staff will be able to operate in an orderly and civil manner.

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XVI. ADOPTION

These Rules and Regulations may be adopted, or amended by the Medical Executive Committee, without prior notice, set forth under Article X of the Staff Bylaws, to become effective when approved by the Board as therein provided.

Adopted November 16, 1999

Amended January 16, 2001

Amended February 2001

Amended September 2001

Amended December 18, 2001 (New Device Policy)

Amended July 2002 (30 Minute Notification Rule for Medical Records)

II. Medical Records, C. Timliness, 2. (second paragraph)

Amended November 2002

Amended June 2003

Amended July 2004

Amended November 2004

Amended April 2005

Amended October 2006

Amended July 2007

Amended September 2008

Amended November 2008

Amended January 2011

Amended August 2012

Amended October 2012

Amended December 2013

Amended March 2014

Amended July 2019

Amended September 2019

Amended October 2019

Amended May 2020