

 Policy and Procedure	Policy Number: 2.03 Policy Area: Range of Actions Owner: Credentialing Committee Approvals: UCSF Benioff Children's Physicians ("BCP")
	Effective: January 18, 2024 Final Approval: January 18, 2024 Next Review: January 2025

PURPOSE:

The intent of the Range of Actions process is to improve upon unsatisfactory performance, thereby promoting effective job performance and adherence to credentialing standards, as well as supporting the quality of UCSF Benioff Children's Physicians ("BCP") patient care. The Range of Actions facilitate, change or modify job conduct and/or improve the future performance. If initial efforts are not successful, this policy outlines a range of actions that the Credentials Committee may recommend if the provider fails to meet expectations pertaining to performance and quality of patient care.

SCOPE:

The Credentials Committee can take action to recommend implementation of corrective action for all contracted and/or employed providers participating with BCP. This includes, at a minimum, physicians (MD or DO), dentists – excluding those who do only primary dental care (DDS), Registered Dietitians (RD), podiatrists (DPM), Clinical Psychologists (PhD), and allied health practitioners such as nurse practitioners and physician assistants (NP, PA), Licensed Clinical Social Workers (LCSW), Optometrists, Genetic Counselors, Marriage Family Therapists (MFT), and Certified Nurse Midwives (CNM) who are contracted and treat patients under BCP contracts and BCP employed providers who fail to meet BCP credentialing standards and expectations

POLICY:

UCSF Benioff Children's Physician (BCP) has established credentialing policies, procedures, and a Code of Conduct to promote quality patient care and a safe, positive, and effective working environment. It is the responsibility of management to ensure that these standards are enforced in a fair, consistent, and equitable manner. This policy outlines potential remedies for contracted and employed practitioners involved in providing care to BCP patients, in the event of a failure to achieve and sustain expected credentialing standards of behavior.

BCP expects every provider to adhere to all rules of conduct, meet performance and credentialing standards, and act responsibly & respectfully. Contracted and employed BCP providers failing to meet expectations and/or credentialing standards will be counseled when appropriate and/or issued a written Corrective Action Plan (CAP) advising them of the matter to be corrected, time frame for corrections, and possible consequences for failure to perform. Any minor performance shall be addressed by Inter Collegial intervention and will be provided by any provider. A more serious performance issue should be addressed by conducting and documenting counseling. Leadership should meet with the provider to discuss any concerns

identified, determine (if possible) the root cause of the problem, develop corrective strategies, and seek provider commitment toward change and improvement within a specific timeframe. Leadership should inform the Credentials Committee and evaluate if the provider needs additional resources such as skills, training, or mentoring.

The BCP Credentials Committee may take further action to recommend implementation of corrective action BCP providers who fail to meet credentialing standards as outlined, or who fail to meet expectations pertaining to performance and quality of patient care may receive:

- a. Collegial Intervention
- b. Documentation and monitoring
- c. Suspension of network participation within BCP
- d. Termination from the BCP network
- e. In cases of immediate risk to patients, the Medical Director may summarily suspend a practitioner from the BCP network, without prior notice, pending a review and investigation into the case

The BCP Credentialing Committee may recommend any disciplinary action deemed appropriate in its sole discretion. Examples of such disciplinary actions include, but are not limited to the following:

- Provider required to submit and adhere to a correction action plan (CAP)
- Time-limited provider monitoring followed by a Credentials Committee determination as to whether substandard performance remains to be corrected
- Provider required to utilize peer consultation
- Provider required to obtain focused, specified training
- Limit the provider's scope of practice in treating eligible patients
- Cease enrolling or referring any new or existing eligible patients
- Obtain additional CMEs in a particular area

Range of Actions Available:

Practitioners are entitled to a fair hearing when a professional review action that will alter participation status is proposed, based on the recommendation from the Medical Director or the Credentialing Committee to the Board of Directors. Changes in status include:

Modification / Restriction

- Fair Hearing procedures apply only to changes in participation status in effect lasting more than thirty (30) days.

Suspension

- Fair Hearing procedures apply only to changes in participation status lasting more than thirty (30) days.

Termination

- When there is no significant improvement identified in the practitioner's performance.