TITLE: Non-Staff Practitioners Ordering Outpatient Tests and Treatments

Initial policy: 3/09
Effective Date: 10/2008 - SHMC
Revised: 3/14 PSHMC MEC; 3/14 PHFH MEC
Revised: 5/14 PSHMC MEC; 5/14 PHFH MEC
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Revised for clarification: MSO Directors 12/2016

PURPOSE: To specify tests and procedures which may be ordered by non-credentialed practitioners, and to ensure outpatient tests and treatments are ordered by licensed practitioners

POLICY:

Non-Credentialed providers:
Physicians®, ARNP’s, and PA-C’s not on the medical staff may order the following outpatient lab tests.

Orders must include complete name, degree, practice name and address, NPI, and contact phone number for the ordering practitioner.
- Lab tests
- Imaging procedures (order must include the purpose of the imaging)

For the following procedures, the order must also include a summary of the patient’s diagnosis and condition.
- Anticoagulation and Pharmacotherapy Clinic Evaluation and Assessments
- IV hydration
- Line placement such as PICC or central lines
- Transfusion of blood or blood products (requires completion of approved blood products transfusion orders and the signed and dated blood consent).

NOTE: If any of the above procedures require moderate sedation (such as sedated MRI’s), the ordering or primary care provider must provide an H&P performed within 30 days of procedure. This H&P will be utilized by the provider performing the procedure on site.

Chiropractors are limited to ordering the following outpatient imaging procedures. Orders must include complete name, degree, address, NPI, and contact phone number.
- X-rays (order must include the purpose of the imaging)
- MRI (orders are accepted for non-sedated cases and must include the purpose of the imaging)
- Video Fluoroscopy (order must include the purpose of the imaging)
• Bone Density

Orders from non-staff providers will NOT be accepted for the following:
• Orders for inpatients.
• Invasive procedures requiring moderate sedation or above (sedated noninvasive imaging procedures are allowed as above).
• Administration of drugs or chemotherapy. Patients may also be referred to Providence Infusion and Pharmacy Services East, 509-924-1826, which is an off-site, non-hospital-based infusion center.
• Orders from practitioners not licensed in the United States (such as licensure in Canada or other countries).
• Orders from providers known to be on any regulatory exclusion list.
• Orders regarding immediate family members.

PROCEDURE:
Provider data management
Staff members receiving outpatient orders will verify privilege status. Providence Health & Services maintains a database of referring, non-credentialed providers which includes current license, current address, and NPI. Current licensing is continually monitored, and providers are matched against the EPLS database for any exclusions from federal payment. (Refer to the Enterprise Referring Provider Compliance Policy.)

Critical values or results: If a critical value or result is found, the result will be called to the ordering physician. If the physician or designee is unable to be located, the on-call specialist (i.e., pathologist, radiologist) will be contacted to discuss the result with the patient. The patient may also be directed to the Emergency Department for an immediate evaluation and management.

If an adverse reaction occurs:
• Serious adverse reactions – call to Rapid Response Team, and transfer to ED for evaluation and treatment
• Minor adverse reactions for which IV fluids, and/or supportive medications (i.e., diphenhydramine) may be indicated, initiate treatment according to nursing protocol, contact to referring/ordering provider to sign order.
• All blood/blood product reactions and suspected reactions are reported to the INBC Medical Director. If deemed appropriate, the INBC Medical Director will assume care for this episode.

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References:
*PSHMC-PHFH follows the CMS and TJC physician definitions:
• Doctor of med or osteopathy
• Doctor of dental surgery or of dental medicine
• Doctor of podiatric medicine

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- Doctor of optometry
- Chiropractor – see limitations listed above

The Joint Commission FAQ – ‘Credentialing Non-Medical Staff Member Licensed Independent Practitioners Who Order Tests and Treatments from a Joint Commission Accredited Organization’, Revised 6/23/06.

Washington State, Medical Test Site Rule, WAC 246-338-010(2) defines that a physician’s order is not required for lab work. Patients can order their own lab work except for HIV testing, genetic testing, and some drug screens. Laboratories may set their own policy on whether they will accept test orders from individuals.

Key Words: Non-staff, outpatient tests