



HLB MEDICAL STAFF E-ALERT TELEMEDICINE

AUGUST 19, 2011

Proxy Credentialing Prohibited, CDPH Claims

Dear Clients & Friends:

As many of you are involved in credentialing of physicians, we want to alert you to the California Public Health's All Facilities Letter ("AFL") 11-33 regarding telemedicine providers dated August 19, 2011. prohibits proxy credentialing in California.

Although CMS recently issued regulations permitting proxy credentialing and The Joint Commission recently issued standards also allowing it, CDPH has taken the position that proxy credentialing is inconsistent with Title 22 standards and is therefore prohibited.

On May 5, 2011, CMS issued final regulations addressing the credentialing and privileging process for physicians and practitioners providing telemedicine services. With the stated purpose of removing hardship and financial burden of requiring hospitals to credential and privilege each practitioner providing telemedicine services, the CMS regulations allow medical staffs to rely upon information furnished by site hospitals and telemedicine providers when privileging individual practitioners.

Following this action by CMS, The Joint Commission in July issued standards that also allow hospitals to grant privileges to distant site practitioners based on an originating site's credentialing decisions under certain conditions.

Despite the position of CMS and The Joint Commission that proxy credentialing is allowable under certain conditions, the AFL conveys the position of CDPH that California hospitals must do their own credentialing and cannot rely on credentialing performed by distant-site providers. The AFL also underscores that practitioners providing telemedicine services must have current and active California licenses.

The position of CDPH does not prohibit California hospitals from using credentialing information provided by the distant-site provider as part of their own credentialing and privileging process.

We understand that there are ongoing discussions between the California Hospital Association and CDPH regarding this topic and its application to California Hospitals.

To access the AFL: <http://www.cdph.ca.gov/certlic/facilities/Documents/LNC-AFL-11-33.pdf>

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