	Department: Corporate Compliance	Policy No.: 604
	<b>TITLE: INFUSION THERAPY - OVERSIGHT AND DOCUMENTATION OF HEALTH PROFESSIONALS' CREDENTIALS</b>	
Effective Date: 1/1/15	Revised: 1/1/15	

## **INFUSION THERAPY – OVERSIGHT AND DOCUMENTATION OF HEALTH PROFESSIONALS' CREDENTIALS**

### **SCOPE:**

All Ascension At Home, LLC colleagues associated with the billing and coding process in anyway. For purposes of this policy, all references to “colleague” or “colleagues” include temporary, part-time and full-time associates, independent contractors, clinicians, officers and directors.

### **PURPOSE:**

The purpose of this Policy is to provide guidelines for all Ascension At Home, LLC and its subsidiaries (the “Company”) on ensuring that all individuals involved in the delivery of infusion therapy care services, either in the pharmacy or as an infusion nurse in a patient’s home, are appropriately licensed and credentialed.


### **POLICY:**

It is the policy of the Company to ensure proper oversight of all licensed health professionals including documentation requirements for personnel records as required under applicable federal and state law.

### **PROCEDURE:**

#### *General Principles*

- The Company shall maintain responsibility for the administration, supervision, and delivery of all pharmacy and infusion therapy services for its patients. To this end, the Company shall ensure that all professional employees and contracted personnel providing pharmacy and infusion therapy services for the Company have all requisite licenses and qualifications.
- The Company must:
  1. Ensure that all professional employees and personnel providing services for the Company have current licenses and registrations;
  2. Maintain documentation in personnel files to substantiate that all licenses and registrations are current as required;

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3. Monitor all staff providing services for the Company to ensure that the services provided to patients are within acceptable professional standards for each discipline;
4. Monitor the professional skill of all staff providing services for the Company to determine that the skills are appropriate for the care required by the patients receiving services from the Company; and
5. Coordinate care among all personnel furnishing services to individual patients.

### ***Pharmacy Personnel***


- Pursuant to state law, each pharmacy owned and operated by the Company shall designate a pharmacist who will serve as the “Pharmacist-in-Charge” and who shall be responsible for complete supervision, management and compliance with all federal and state pharmacy laws and regulations pertaining to the practice of pharmacy in the entire prescription department.
- All professional activities of the pharmacy shall occur under the direct supervision of a registered pharmacist (either the Pharmacist-in-Charge or another appropriately licensed pharmacist) who accepts responsibility for the dispensing and compounding of medicines, and the provision of all pharmacy services, during the time period within which that pharmacist is present at the pharmacy.
- As permitted under federal and state law, a pharmacist may delegate a specific task to a qualified professional (e.g., a Pharmacy Technician), provided, however, that the delegating pharmacist maintains ultimately responsibility for the delegated act performed.

### ***Infusion Nurses***

- The Company requires that in order for a nurse to be responsible for providing infusion therapy, such nurse must: be skilled in the insertion of venous catheters in difficult locations; understand the wide variety of catheter options and determine which is best for a particular situation, treatment and patient.

### ***Services Furnished Under Arrangement or Hourly/Per-Visit Contracts***

- Professional services furnished under an arrangement with an individual or per-diem/temporary agency must be supported by a written agreement or contract between such personnel or organization and the Company. The written agreement or contract must specify the following:

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1. Patients are accepted for care only by the Company;
2. The services to be furnished under the agreement or contract;
3. The necessity to conform to all applicable Company policies, including personnel qualifications;
4. The manner in which services will be controlled, coordinated, and evaluated by the Company;
5. The procedure for payment for services furnished under the agreement or contract.