

VHA NATIONAL TELERADIOLOGY PROGRAM

1. REASON FOR ISSUE: This Veterans Health Administration (VHA) directive updates VHA policy for the mechanism for credentialing and privileging of teleradiologists who are appointed to the National Teleradiology Program (NTP) in the Department of Veteran Affairs (VA).

2. SUMMARY OF MAJOR CHANGES: Major changes include:

- a. Adding definitions in paragraph 3.
- b. Updating responsibilities in paragraph 5.

3. RELATED ISSUES: VHA Handbook 1100.19, Credentialing and Privileging, dated October 15, 2012.

4. RESPONSIBLE OFFICE: The Office of Diagnostics Services (10P11D) in the Office of Specialty Care Services (10P11) is responsible for the contents of this directive. Questions may be addressed to 1-877-780-5559.

5. RESCISSIONS: VHA Directive 1084, Privileging for VHA Teleradiology, dated December 5, 2014, is rescinded.

6. RECERTIFICATION: This VHA directive is scheduled for recertification on or before the last working day of April 2025. This VHA directive will continue to serve as national VHA policy until it is recertified or rescinded.

**BY DIRECTION OF THE UNDER
SECRETARY FOR HEALTH:**

/s/ Lucille B. Beck, PhD.
Deputy Under Secretary for Health
for Policy and Services

NOTE: *All references herein to VA and VHA documents incorporate by reference subsequent VA and VHA documents on the same or similar subject matter.*

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CONTENTS

VHA NATIONAL TELERADIOLOGY PROGRAM

1.PURPOSE..... 1

2.BACKGROUND..... 1

3.DEFINITIONS 1

4.POLICY 2

5.RESPONSIBILITIES 2

6.TRAINING 4

7.RECORDS MANAGEMENT..... 4

8.REFERENCES..... 4

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1. PURPOSE

This Veterans Health Administration (VHA) directive updates policy concerning privileging for VHA teleradiology by the National Teleradiology Program (NTP).

AUTHORITY: Title 38 United States Code (U.S.C.) 1730C, 7301(b); Title 38 Code of Federal Regulations (CFR) 17.417.

2. BACKGROUND

a. NTP provides 24/7 diagnostic radiology services to Department of Veterans Affairs (VA) medical facilities located in all Veterans Integrated Service Networks (VISNs), rendering final diagnostic interpretations on a wide variety of modalities including computerized tomography scans (CTs), X-rays, magnetic resonance imaging (MRI), ultrasound, and nuclear medicine imaging studies.

b. Previously, VHA radiologists were required to be privileged at each VA medical facility for which they provided service. In the case of NTP, each health care provider would need to maintain privileges at dozens of hospitals. This created an administrative burden. To overcome this hurdle, VHA negotiated the establishment of a national privileging program with The Joint Commission on October 11, 2007.

c. The Joint Commission standards allow an originating site (where the patient is located) to use the credentialing and privileging information of telemedicine practitioners from a distant site if there is a contractual agreement for interpretive services, telemedicine or direct care telemedicine, and the distant site is a Joint Commission-accredited health care organization. It is not necessary for The Joint Commission accreditation personnel to maintain a complete credentials file for each health care provider, or to fully credential the health care provider using the originating site hospital process.

d. The Joint Commission and VHA agreed to a privileging program that treats NTP as a unique entity for purposes of credentialing and privileging. NTP is a clinical service of its host site VA medical facility (VA Palo Alto Health Care System) and is part of that VA medical facility's survey.

3. DEFINITIONS

a. **Distant Site.** A distant site is the site where an NTP teleradiologist provides telehealth to a patient receiving care at an originating site. NTP provides teleradiology service within VA consistent with negotiated Memoranda of Understanding (MOU) with individual originating sites. NTP distant sites are responsible for ensuring that teleradiologists working for NTP are properly credentialed by the host site and providing credentialing/privileging information to the originating site upon request. **NOTE:** *For the purposes of this directive NTP is the distant site.*

b. **Host Site.** The host site is VA Palo Alto Health Care System, the VA medical facility where NTP is located, and is responsible for credentialing and privileging of teleradiologists who are working for NTP, allowing them to provide telemedicine in VA, consistent with the agreement between VA and The Joint Commission.

c. **NTP Teleradiologist.** An NTP teleradiologist is a radiologist at a distant site who performs radiology interpretations via an approved NTP workstation. **NOTE:** *Teleradiologists appointed to NTP do not need to be credentialed and privileged at the VA medical facility served by NTP if they are working within the scope of their NTP duties.*

d. **Originating Site.** An originating site is the VA medical facility where the patient is enrolled for care, which originates the teleradiology consult.

e. **Telehealth (Telemedicine).** Telehealth (telemedicine) is the use of electronic information or telecommunications technologies to support clinical health care, patient and professional health-related education, public health, and health administration at a distance.

4. POLICY

It is VHA policy that National Teleradiology Program teleradiologists be credentialed and privileged by the VA Palo Alto Health Care System, and that they participate in the NTP quality assurance program.

5. RESPONSIBILITIES

a. **Under Secretary for Health.** The Under Secretary for Health is responsible for ensuring overall VHA compliance with this directive.

b. **Deputy Under Secretary for Health for Operations and Management.** The Deputy Under Secretary for Health for Operations and Management is responsible for:

(1) Communicating the contents of this directive to each of the VISNs.

(2) Ensuring that each VISN Director has sufficient resources to implement this directive in all VA medical facilities within that VISN.

(3) Providing oversight of VISNs to assure compliance with this directive, relevant standards, and applicable regulations.

c. **Deputy Under Secretary for Health for Policy and Services.** The Deputy Under Secretary for Health for Policy and Services is responsible for providing oversight to ensure compliance with this directive across VHA.

d. **Director, National Teleradiology Program.** The Director, NTP, is responsible for:

(1) Signing the MOU between NTP and each VA medical facility (originating site) receiving teleradiology services from NTP.

(2) Maintenance of the provider profile data of each NTP teleradiologist to support the teleradiologist's renewal of privileges.

(3) Ensuring competency data is collected, and reviews are performed for all teleradiology providers. Competency statistics of teleradiologists' performance at NTP are available upon request from the NTP Business Office to the relevant VA medical facility Chief of Service at the originating site.

(4) Overseeing the collection of quality assurance surveys from all VA medical facilities that receive service from NTP for use in the annual report of quality and performance monitors. Information collected includes, but is not limited to, quality assurance standards of satisfaction, timeliness of services, accuracy of interpretation, and communication of critical results.

(5) Ensuring an annual report of quality and performance improvement monitors is submitted to the Quality Manager at the host VA medical facility, the Quality Manager at each VA medical facility served by NTP upon request, and the Teleradiology Governance Board. **NOTE:** *This annual report must de-identify all patient, physician, and VA medical facilities.*

e. **Veterans Integrated Service Network Director.** The VISN Director is responsible for ensuring that VA medical facilities provide resources to ensure adherence to this directive.

f. **Veterans Integrated Service Chief Medical Officer.** The VISN Chief Medical Officers (CMO) is responsible for oversight of credentialing and privileging programs within their respective VISN, including VA medical facilities' adherence to this directive.

g. **Host Site VA Medical Facility Director.** The host site VA medical facility (VA Palo Alto Medical Center) Director is responsible for:

(1) Providing oversight of NTP and overseeing the quality assurance program of NTP at the host VA medical facility.

(2) Ensuring all teleradiologists who are appointed to NTP are privileged at its host site VA medical facility to practice teleradiology.

(3) Ensuring a copy of NTP teleradiologists' credentials and privileges is available at each site served by NTP. Credentials must be entered in the VetPro credentialing information system. **NOTE:** *Credentialing and privileging documents must be maintained in accordance with VHA Handbook 1100.19, Credentialing and Privileging, dated October 15, 2012 and VHA Directive 2012-030; Credentialing of Health Care Professionals, dated October 11, 2012; and the System of Records Notice 77VA10A4, "Health Care Provider Credentialing and Privileging Records - VA".*

(4) Ensuring the Medical Staff Office (MSO) includes NTP in The Joint Commission accreditation survey of the host site VA medical facility to which NTP teleradiologists are appointed.

h. **Originating Site VA Medical Facility Director.** The originating site VA medical facility Director is responsible for:

(1) Ensuring a signed MOU is established between the originating site VA medical facility and NTP. See paragraph 5.d.(1).

(2) Ensuring that quality assurance information outlined in the MOU is communicated with NTP.

i. **Originating Site VA Medical Facility Chief of Imaging Service.** The originating site VA medical facility Chief of Imaging Service is responsible for notifying NTP of any discrepancies in interpretations or other quality concerns.

j. **Originating Site VA Medical Facility Quality Manager.** The originating VA medical facility Quality Manager is responsible for:

(1) Communicating quality assurance information including results of professional practice reviews, as well as any complications or incidents that result in adverse or serious patient outcomes to NTP.

(2) Receiving the annual report of quality and performance improvement monitors from NTP's Director or Quality Assurance Chair.

6. TRAINING

There are no formal training requirements associated with this directive.

7. RECORDS MANAGEMENT

All records regardless of format (e.g., paper, electronic, electronic systems) created in this directive shall be managed per the National Archives and Records Administration (NARA) approved records schedules found in VA Records Control Schedule 10-1. Questions regarding any aspect of records management should be addressed to the appropriate Records Manager or Records Liaison. **NOTE:** *Credentialing and privileging documents must be maintained in accordance with VHA Handbook 1100.19 and Directive 2012-030 and the System of Records Notice 77VA10A4, "Health Care Provider Credentialing and Privileging Records - VA".*

8. REFERENCES

a. 38 U.S.C. 1730C.

b. 38 U.S.C. 7301(b).

c. 38 CFR 17.417.

d. Credentialing and Privileging for Providers from the Joint Commission Accredited Organization. **NOTE:** For more information, please see:
http://www.jointcommission.org/accreditation/accreditation_main.aspx.

e. *Final Revisions to Telemedicine Standards; Joint Commission Perspectives, January 2012, Volume 32, Issue 1.* **NOTE:** For more information, please see:
https://www.jointcommission.org/assets/1/6/Revisions_telemedicine_standards.pdf.
This linked document is outside VA control and may not conform to Section 508 of the Rehabilitation Act of 1973.