



## **QUESTION AND ANSWER SHEET**

### **Late Career Provider Policy:**

1. *Why was this policy developed?*

As individuals age, the natural aging process and specific medical conditions and medications have the potential to adversely affect the capacity of practitioners to carry out their clinical responsibilities. Most of us have known or heard of cases of at least one physician who practiced beyond the time when he/she was most effective, and many of us have struggled with how to best handle that to protect patients and the reputation and self-esteem of the physician. For this reason it is important, from the point of view of both patient safety and physician well being, to establish a process by which late career physicians' performance and capacities can be fairly and accurately evaluated.

2. *What are the goals of this policy?*

The policy has the following goals:

- To provide patients with medical care of high quality and safety and protect them from harm.
- To identify issues that may be pertinent to the health and clinical practice of medical staff members.
- To support members of the medical staff.
- To apply evaluation criteria objectively, equitably, respectfully, and confidentially.
- Key elements of the policy are to assure high quality care for the patient, to be supportive of the practitioner, and to address issues that the individual may not recognize.

3. *When do I need to enroll in the PACE Aging Physician Assessment ("PAPA") program?*

You are required to complete all evaluations prior to the first reapplication appointment after you turn 70 years old and every subsequent reapplication for privileges.

If you are an initial applicant and turning age 70, you are required to complete the late career provider assessment process as part of your application process.

4. *What is the absolute deadline for having completed the PAPA program evaluation? Do I need to have just completed the report prior to my reappointment and after my 70<sup>th</sup> birthday or do all evaluations need to be completed?*

You need to enroll and complete the initial PAPA assessment four (4) months prior to the expiration of your privileges. The PAPA program will submit its evaluation to the TFHD Medical Staff Services office within sixty (60) days of completion of the assessment. This will give two (2) months prior to the expiration of your privileges for any needed further evaluations, discussions, and accommodations.

5. *What is required in the "Letter of Intent"?*

The Letter of Intent for Application or Reapplication for Privileges requests that you describe for us what your plans are for the next two (2) year term of your privileges. Please include details about the work-load you would like to do, including number and timing of shifts, numbers of patients, call responsibilities, and other administrative or teaching responsibilities. Include your plans for changing your work-load or retirement, if any. This needs to be submitted four (4) months prior to the expiration of your appointment. PAPA will have a more detailed questionnaire for their enrollment form.

6. *Can I ask to see the evaluation prior to medical staff representatives? When do I receive my copy of the PAPA report?*

The PAPA report will be sent to the Medical Staff Services office at TFHS and provided to the Chief of Staff and Chief Medical Officer, and your Department Chair, as deemed appropriate. To fully complete this assessment, this will include any and all reports. As soon the report(s) is received you will be notified and a meeting will be arranged to share and discuss the report. You can bring a colleague or a member of the Well-Being Committee ("WBC") to this meeting if you wish. All results are confidential.

7. *Are the costs of all evaluations covered by the authorization form?*

If you are applying for reappointment to the medical staff, the cost of the first (PAPA) assessment is covered by TFHS. If you are an initial applicant, the cost of all evaluations are the responsibility of the applicant.

*Can subsequent evaluations, as paid for by the practitioner, be first disclosed to the practitioner and kept private if request for privileges are withdrawn?*

Yes.

You must disclose all evaluations that result from this process to the COS/CMO, unless you have withdrawn your request for privileges. You can withdraw your application at any time. Neither of these scenarios are reportable.

8. *How will my private medical information be handled? For example, will PAPA disclose an HIV status to the COS/CMO? Will it be disclosed only if relevant to cognitive evaluation? If more in-depth medical evaluation is needed, does that need to be submitted entirely or can a summary evaluation letter be submitted? What level of detail is required from further evaluations?*

PAPA will only report medical conditions if they are related to a detected impairment. Otherwise, all medical history will be confidential within the PAPA program. Any further evaluations need to specifically address the concern about potential impairment. These evaluations must be performed by an approved consultant, specifically someone qualified to evaluate physicians. Follow-up evaluations may be requested by the COS/CMO or WBC if the initial evaluation is not deemed adequate.

9. *At what point can I voluntarily withdraw my application for privileges? Is there any point where I cannot voluntarily withdraw it?*

You can withdraw your application for initial appointment or reappointment at any time in this process without consequence. There is no point in this process where you cannot voluntarily withdraw it.

10. *If PAPA recommends additional evaluations:*

a. *What are my options?*

We will provide a list of easily accessible neuropsychologists for further evaluation. Other specialists will be consulted on an as-needed basis. Evaluators do need to be approved by the COS/CMO or WBC.

b. *Will COS / WBC provide me with a list of neuropsychology evaluator choices?*

Yes

c. *Can I choose my own evaluator/process?*

You may select a different evaluator, but must submit the name and qualifications to the COS/CMO or WBC for approval. It needs to be a professional with experience evaluating late career physicians.

d. *Who will pay for these evaluations?*

These costs will be the responsibility of the applying practitioner. However, if you are reapplying for privileges, the medical staff and TFHS may reimburse you for some of your out-of-pocket expenses.

e. *What is the time-frame for completing these evaluations? Are there deadlines?*

All PAPA evaluations need to be completed and received by the COS/CMO at least two (2) month prior to the expiration of your privileges. This will give you three (3) to (4) months to complete these evaluations. If they are not completed within that time frame, your application will be considered withdrawn. (Special extensions may be granted in certain circumstances.)

f. *What will the appeal process be for me to get further evaluations?*

You can get additional evaluations at any point. You need to have them all completed at least one (1) month prior to your expiration of privileges.

g. *Assuming no alarming findings are uncovered, but further evaluations are being pursued: what will happen to clinical privileges during this time of evaluation? If there is a suspension of privileges, is that reportable? What will the time-frame be for continued work?*

There will be no suspension of your privileges during this process unless serious findings are uncovered that are an immediate risk to patient safety. This evaluation must be completed prior to the expiration of your privileges so you can continue to work as planned. If the evaluation has not been completed by the deadlines above or by the time your privileges expire, your application will be deemed incomplete and you will no longer have clinical privileges at a TFHD facility.

If you are an initial applicant, the process must be completed prior to your application being considered by the Medical Staff Executive Committee.

11. *At what point do I have the right to legal representation?*  
Anyone may retain legal counsel at any time. If requested privileges are not agreed upon, you will be given an opportunity to be heard by the Medical Executive Committee practitioners must exhaust the remedies afforded by the Medical Staff Bylaws before resorting to legal action.  
If you are a new applicant requesting initial appointment and privileges, the results of your PAPA assessment will be considered and a determination will be made whether you are able to perform, with or without reasonable accommodation, the necessary functions of a member of the Medical Staff.
12. *Isn't this policy discriminatory based on age?*  
The policy is designed to be supportive of the practitioner and to assure that the quality of care for patients is not compromised due to decline in function or cognition. It is analogous to other age-specific requirements such as driving tests at certain ages that recognize the reality of physical and cognitive declines as we age and, most especially, the potential negative consequences to others of those declines. The screen is designed to determine whether there may be, but not necessarily are, issues of competence in delivery of care. If a concern is identified, there are further screens, discussions with the Chief of Staff, CMO, or Department Chair, and opportunity to appeal an adverse determination. There is also a commitment to help the practitioner to determine how he or she may continue to practice safely.
13. *What happens when practitioners turn 80?*  
We will consider yearly evaluations after reaching the age of 80.
14. *Will the Medical Executive Committee accept a suitable substitute evaluation program such as a Utah evaluation if requested by the physician?*  
At this time, the only acceptable initial evaluation is through the University of San Diego's PAPA program. If an alternative program is proposed, it must be approved and will be at the cost of the applicant.
15. *If I choose to have the Well Being Committee (WBC) assist me from the beginning, can they see the initial PAPA report immediately along with the COS, CMO, or department chair? Can they be present for meetings with the COS/CMO?*  
At any time you can request the assistance of the WBC. The WBC may also be asked by the COS/CMO to assist. The involvement of the WBC can vary with each situation and at the request of the practitioner, e.g. simple conversation for support and understanding of the process, assistance seeking further evaluations, presence at and mediation of discussions, or help with making accommodations. As always, all discussions with the WBC will be confidential. In addition, psychology sessions are available with Kirk Ditterich, clinical psychologist, at the practitioner's request.
16. *MicroCOG Testing: Will there be an opportunity to retest? Can we petition to do a different evaluation if evidence supports a substitute (or better) evaluation?*  
You would have to discuss with PAPA program representatives regarding retesting. They do ensure you are in your best state (e.g. not post-call) to get the fairest assessment. At this time, the MicroCOG is the only testing tool we will accept. It's the best test available at this time and the test PAPA neuropsychologists will use as part of their evaluations.

Outline of Deadlines: (will be filled in for each applicant)

Date of expiration of privileges (unless initial applicant):	
Notify applicant of policy and deadlines (6 months prior)	
PAPA program assessment completed (4 months prior)	
PAPA report received by MSS (2 months prior)	
MSS receives Letter of Intent from provider (3 months prior)	
Evaluations and discussions of accommodations, if appropriate (1-2 months prior)	
All evaluations submitted and application complete for submission to MEC (15 days prior)	