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Regulations, contracts, and credentialing for medical directors and attending physicians

by Donna Thiel and Laura Carrico

There are many rules and regulations governing attending physician visits and medical directors. Unfortunately, there is plenty of room for error when documenting attending physician visits, establishing medical director contracts, and credentialing and privileging your providers. But steps can be taken to ensure your healthcare organization remains a fine example of safe and legal patient care. Organizations have a responsibility to abide by regulatory requirements to ensure patient safety and avoid healthcare fraud, waste, and abuse. Two common challenges with skilled nursing facilities (SNFs) involve the accuracy and timeliness of physician visits and how they document, outline, and compensate medical directors' services in their contracts.

Properly credentialing your providers is another vital step in healthcare compliance. Establishing a consistent evaluation process can save organizations from unnecessary fraud, waste, and abuse within their facilities. But while credentialing ensures your providers are properly licensed and certified to provide care, privileging requires your provider to prove they can perform the skills they purport to deliver. Together, credentialing and privileging ensure that your providers are qualified to do their jobs and capable of performing their jobs to the required standards.

What are the regulatory requirements for physician visits?

SNFs are regulated by federal and state laws, with one crucial regulatory requirement demanding the presence of a medical director who can oversee that facility's medical care.^[1] The medical care of each resident in a SNF must also be supervised by a physician.^[2] This means a physician is responsible for overseeing the care provided to each resident and ensuring they meet the mandatory medical standards. When the attending physician is unavailable, another physician must supervise the residents' medical care.

There are also specific guidelines that must be followed to ensure the regularity and timeliness of physician visits. For the first 90 days after admission, a patient must be seen by a physician at least once every 30 days. After this initial period, a physician visit must occur at least once every 60 days. To be considered timely, physician visits should occur no later than 10 days after the required date. These regulations are in place to safeguard the well-being of residents in SNFs and maintain transparency in healthcare practices.

Tips to ensure regulatory compliance for physician visits

Tracking the frequency of physician visits is an important aspect of compliance, and the responsibility for tracking these visits typically falls on the administrative staff of the SNF. Staff must keep accurate records of each resident's physician visits, including the date of the visit and the supervising physician. This information is imperative for both regulatory compliance and reimbursement purposes.

Routine reviews of physician visit metrics can also be conducted to identify any deviations or deficiencies. By regularly reviewing metrics, SNFs can ensure physician visits occur as required and address any potential gaps in care. This review process helps maintain the quality of medical care provided to residents and guarantees compliance with regulatory standards.

In cases where deficiencies are identified in physician visit metrics, it's advisable to have an escalation process in place. This allows for timely intervention and corrective measures to rectify any issues. The facility should establish protocols for addressing deficiencies, which may include communication with the medical director or attending physician, additional training for staff, or implementing new systems to improve compliance with regulatory requirements.

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