

Provider Bulletin #16-09
Philadelphia Behavioral Health System
Community Behavioral Health
Certified Registered Nurse Practitioner (CRNP) Requirements for Inpatient
Psychiatric Services and Residential Treatment Facilities
December 2, 2016

CRNP Utilization

This Bulletin refers specifically to services designated for the CRNP within the *Inpatient Psychiatric (IP) and Residential Treatment Facility (RTF)* levels of care.

CRNPs are not approved as “sign-off” designees for completion of a Comprehensive Biopsychosocial Evaluation (CBE), as Licensed Psychologists and Psychiatrists remain as the only recognized participant signatories for their respective CBEs.

CRNPs may not sign treatment plans in lieu of the psychiatrist.

The utilization of a CRNP does not replace the required psychiatrist coverage for RTF and IP levels of care. For the Inpatient level of care, an admission and discharge note must be completed by the psychiatrist.

Effective January 2, 2016:

- CRNPs providing services in the RTF and IP levels of care described above must be certified by the Commonwealth of Pennsylvania Board of Nursing in a ***Psychiatric / Mental Health*** specialty area.
- CRNPs serving children and/or adolescents must *also* have a certification in a ***Child / Adolescent*** related field, or clinical experience working with this population.
- The collaborating physician must be a psychiatrist providing services at the same physical location, and the same CBH provider number as the CRNP. For CRNPs serving children and/or adolescents, the collaborating physician must be a board certified child psychiatrist.
- The CRNP must receive at least one hour of documented supervision per week with one of the following: the collaborating physician, the substitute collaborating physician or the medical director. Supervision must include a chart review with feedback from the physician.

Providers that have hired CRNPs that are not certified in a Psychiatric / Mental Health specialty area before January 2, 2017, may continue to provide services at that provider, if they are adhering to the previous CBH requirement of maintaining an *appropriate clinical certification by the Commonwealth of Pennsylvania Board of Nursing in a related specialty area with demonstrated experience and education for mental health.*

Providers wishing to utilize CRNPs with a specialty other than Psychiatric / Mental Health may apply for a waiver. The documentation noted below must be submitted along with a clear justification for utilizing a CRNP in another related specialty area. The relationship of the specialty area to Psychiatric / Mental Health, along with the relevance of the CRNP’s experience and education must be outlined in detail. Application for a waiver is not a guarantee of the

waiver being granted. Providers will receive a response to the waiver request within 60 days of the request.

Documentation Requirements for Personnel File

The provider must maintain *current* documentation of the following in the personnel file for each CRNP:

- Collaborative Agreement (49 PA Code § 21): The prescriptive authority collaborative agreement between a physician and a CRNP who will prescribe and dispense drugs and other medical therapeutic or corrective measures, as set forth in § 21.283(a) (relating to authority and qualifications for prescribing, dispensing and ordering drugs) must satisfy the following requirements. The agreement must:
 - Be in writing, identify the parties, including the collaborating physician, the CRNP, and at least one substitute physician who will provide collaboration if the collaborating physician is unavailable, include the signature of the CRNP and the collaborating physician, and contain the date that the agreement is signed and the date that the agreement is effective.
 - Identify the specialty in which the CRNP is certified.
 - Identify the categories of drugs from which the CRNP may prescribe or dispense in accordance with section 8.3 (a)(2)(ii) of the act (63 P. S. § 218.3(a)(2)(ii)).
 - Specify the circumstances and how often the collaborating physician will personally see the patient.
 - Specify the amount of professional liability insurance that covers the CRNP.
- Scope of Service, including caseload and supervision structure and plan for Psychiatrist oversight of CRNP
- Current CRNP Licenses reflecting the following:
 - The specialty area
 - Prescribing authority
 - Collaborating physician
- Curriculum vitae
- DEA Certificate
- Liability insurance documentation
- National Practitioner Data Bank report
- All required clearances
- Documentation of CBH mandatory trainings
- Any other documentation outlined in the CBH Manual for Review of Provider Personnel Files