

## Maternal Levels of Care Verification Comparison Grid

Program Concept	Level I	Level II	Level III	Level IV	Notes
<b>General Eligibility</b>	The obstetric unit must be in the United States, operated by the U.S. government, or operated under a charter of the U.S. Congress	The obstetric unit must be in the United States, operated by the U.S. government, or operated under a charter of the U.S. Congress	The obstetric unit must be in the United States, operated by the U.S. government, or operated under a charter of the U.S. Congress	The obstetric unit must be in the United States, operated by the U.S. government, or operated under a charter of the U.S. Congress	
<b>Program Specific Eligibility</b>	Any perinatal care program may apply for Joint Commission maternal levels of care verification under the standards in this manual if the following requirements are met: <ul style="list-style-type: none"> <li>The perinatal care program is provided within a Joint Commission–accredited hospital or critical access hospital, or it is provided within an organization that is compliant with applicable federal laws, including applicable Medicare Conditions of Participation.</li> </ul>	Any perinatal care program may apply for Joint Commission maternal levels of care verification under the standards in this manual if the following requirements are met: <ul style="list-style-type: none"> <li>The perinatal care program is provided within a Joint Commission–accredited hospital or critical access hospital, or it is provided within an organization that is compliant with applicable federal laws, including applicable Medicare Conditions of Participation.</li> </ul>	Any perinatal care program may apply for Joint Commission maternal levels of care verification under the standards in this manual if the following requirements are met: <ul style="list-style-type: none"> <li>The perinatal care program is provided within a Joint Commission–accredited hospital or critical access hospital, or it is provided within an organization that is compliant with applicable federal laws, including applicable Medicare Conditions of Participation.</li> </ul>	Any perinatal care program may apply for Joint Commission maternal levels of care verification under the standards in this manual if the following requirements are met: <ul style="list-style-type: none"> <li>The perinatal care program is provided within a Joint Commission–accredited hospital or critical access hospital, or it is provided within an organization that is compliant with applicable federal laws, including applicable Medicare Conditions of Participation.</li> </ul>	
<b>Participation Requirements</b>	VPR.12 The perinatal program is part of an organization that is compliant with applicable	VPR.12 The perinatal program is part of an organization that is compliant with applicable	VPR.12 The perinatal program is part of an organization that is compliant with applicable	VPR.12 The perinatal program is part of an organization that is compliant with applicable	

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	federal laws, including Medicare Conditions of Participation.	federal laws, including Medicare Conditions of Participation.	federal laws, including Medicare Conditions of Participation.	federal laws, including Medicare Conditions of Participation.	
<b>Research</b>	Not required	Not required	Not required	Not required	
<b>Leadership</b>	<p>The program has dedicated leadership and staff necessary to meet the scope of care, treatment, and services it provides across the continuum of care based on the organization's verified Maternal Level of Care.</p> <p>See MLCPM.02</p>	<p>The program has dedicated leadership and staff necessary to meet the scope of care, treatment, and services it provides across the continuum of care based on the organization's verified Maternal Level of Care.</p> <p>See MLCPM.02</p>	<p>The program has dedicated leadership and staff necessary to meet the scope of care, treatment, and services it provides across the continuum of care based on the organization's verified Maternal Level of Care.</p> <p>See MLCPM.02</p> <p>Perinatal services leadership facilitate collaboration with facilities in the region, analysis and review of system perinatal outcome and quality data, provision of outreach education, and assistance with quality.</p> <p>See MLCPM.02, EP 9</p>	<p>The program has dedicated leadership and staff necessary to meet the scope of care, treatment, and services it provides across the continuum of care based on the organization's verified Maternal Level of Care.</p> <p>See MLCPM.02</p> <p>Perinatal services leadership facilitate collaboration with facilities in the region, analysis and review of system perinatal outcome and quality data, provision of outreach education, and assistance with quality.</p> <p>See MLCPM.02, EP 9</p>	
<b>Obstetric Nursing Leadership</b>	<p>A nursing leader with perinatal nursing care experience is responsible for management of the program's perinatal nursing care services.</p> <p>See MLCPM.02, EP 6</p>	<p>A nursing leader with perinatal nursing care experience is responsible for management of the program's perinatal nursing care services.</p> <p>See MLCPM.02, EP 6</p>	<p>A nursing leader with perinatal nursing care experience is responsible for management of the program's perinatal nursing care services.</p> <p>See MLCPM.02, EP 6</p>	<p>A nursing leader with perinatal nursing care experience is responsible for management of the program's perinatal nursing care services.</p>	

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				The perinatal nursing care services' leader has an advanced degree and national certification. See MLCPM.02, EP 6	
<b>Obstetric Provider Leadership</b>	<p>A qualified provider with obstetric privileges is responsible for management of the program's obstetric services.</p> <p>The program's obstetric services' leader is a board-eligible or board-certified physician with experience in obstetric care.</p> <p>See MLCPM.02, EP 3</p>	<p>A qualified provider with obstetric privileges is responsible for management of the program's obstetric services.</p> <p>The program's obstetric services' leader is a board-eligible or board-certified physician with experience in obstetric care.</p> <p>See MLCPM.02, EP 3</p>	<p>A qualified provider with obstetric privileges is responsible for management of the program's obstetric services.</p> <p>The program's obstetric services' leader is a board-eligible or board-certified physician with experience in obstetric care or a board-eligible or board certified maternal-fetal medicine physician.</p> <p>See MLCPM.02, EP 3</p>	<p>A qualified provider with obstetric privileges is responsible for management of the program's obstetric services.</p> <p>The program's obstetric services' leader is a board-eligible or board-certified physician with experience in obstetric care or a board-eligible or board certified maternal-fetal medicine physician.</p> <p>See MLCPM.02, EP 3</p>	
<b>Anesthesia Services Leadership</b>	<p>A qualified provider with anesthesia privileges is responsible for management of the program's obstetric anesthesia services.</p> <p>See MLCPM.02, EP 4</p>	<p>A qualified provider with anesthesia privileges is responsible for management of the program's obstetric anesthesia services.</p> <p>See MLCPM.02, EP 4</p>	<p>A qualified provider with anesthesia privileges is responsible for management of the program's obstetric anesthesia services.</p> <p>The director of obstetric anesthesia services is a board-certified anesthesiologist</p>	<p>A qualified provider with anesthesia privileges is responsible for management of the program's obstetric anesthesia services.</p> <p>The director of obstetric anesthesia services is a board-certified anesthesiologist</p>	

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			with obstetric anesthesia fellowship training or experience in obstetric anesthesia.  See MLCPM.02, EP 4	with obstetric anesthesia fellowship training or experience in obstetric anesthesia.  See MLCPM.02, EP 4	
<b>Maternal Fetal Medicine Leadership</b>	A qualified provider with obstetric privileges is responsible for the management of the program's maternal-fetal medicine specialist program in organizations that have a maternal-fetal-medicine specialist program.  See MLCPM.02, EP 5	A qualified provider with obstetric privileges is responsible for the management of the program's maternal-fetal medicine specialist program in organizations that have a maternal-fetal-medicine specialist program.  See MLCPM.02, EP 5	A qualified provider with obstetric privileges is responsible for the management of the program's maternal-fetal medicine specialist program in organizations that have a maternal-fetal-medicine specialist program.  The director of the maternal-fetal medicine program is a board-eligible or board-certified maternal-fetal medicine physician.  See MLCPM.02, EP 5	A qualified provider with obstetric privileges is responsible for the management of the program's maternal-fetal medicine specialist program in organizations that have a maternal-fetal-medicine specialist program.  The director of the maternal-fetal medicine program is a board-eligible or board-certified maternal-fetal medicine physician.  See MLCPM.02, EP 5	
<b>Support from ancillary departments</b>	The program provides support from other departments such as anesthesia, respiratory, radiology, ultrasound, laboratory, and blood bank services 24 hours a day, 7 days a week. Suitable backup systems and plans are in place that meet the emergent needs of the mother.	The program provides support from other departments such as anesthesia, respiratory, radiology, ultrasound, laboratory, and blood bank services 24 hours a day, 7 days a week. Suitable backup systems and plans are in place that meet the emergent needs of the mother.	The program provides support from other departments such as anesthesia, respiratory, radiology, ultrasound, laboratory, and blood bank services 24 hours a day, 7 days a week. Suitable backup systems and plans are in place that meet the emergent needs of the mother.	The program provides support from other departments such as anesthesia, respiratory, radiology, ultrasound, laboratory, and blood bank services 24 hours a day, 7 days a week. Suitable backup systems and plans are in place that meet the emergent needs of the mother.	

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	<p>a. An anesthesia provider with the capability to administer labor analgesia and surgical anesthesia is readily available at all times, per the organization's policy.</p> <p>b. The program has the ability to initiate a massive transfusion protocol and has a process in place to obtain more blood components, including platelets, if needed.</p> <p>c. The program has limited obstetric ultrasonography with interpretation readily available at all times, per the organization's policy.</p>	<p>Meet the requirements for Maternal Level of Care I and the following:</p> <p>d. Radiologic services with interpretation are readily available per the organization's policy and include computed tomography scan, magnetic resonance imaging, non-obstetric ultrasound imaging, standard obstetric ultrasound imaging, and maternal echocardiography.</p> <p>e. An anesthesiologist is readily available at all times, per the organization's policy.</p>	<p>Meet the requirements for Maternal Level of Care II and the following:</p> <p>f. In-house availability of all blood components.</p> <p>g. Specialized obstetric ultrasound and fetal assessment, including Doppler studies, with interpretation readily available at all times, per the organization's policy.</p> <p>h. Basic interventional radiology (capable of performing uterine artery embolization), readily available at all times, per the organization's policy.</p> <p>i. Appropriate personnel and equipment available on site 24 hours a day, 7 days a week to provide the capability to ventilate and monitor women in labor and delivery until they can be safely transferred to the intensive care unit.</p> <p>j. Availability of adult medical and surgical intensive care units that accept pregnant women and women in the postpartum period. The intensive care units are staffed by adult critical care providers on site 24 hours a day, 7 days</p>	<p>Meet the requirements for Maternal Level of Care III and the following:</p> <p>l. On-site medical and surgical capabilities for complex maternal conditions.</p> <p>m. On-site intensive care unit care for obstetric patients who are primarily or comanaged by a maternal-fetal medicine team. (Co-management includes at least daily rounds by a maternal-fetal medicine specialist physician with interaction with the intensive care unit team and other subspecialists with daily documentation)</p> <p>n. A board-certified anesthesiologist with obstetric anesthesia fellowship training or experience in obstetric anesthesia physically present on site 24 hours a day, 7 days a week.</p>	
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			a week. k. Board certified anesthesiologist is on site 24 hours a day, 7 days a week		
<b>Obstetric Services</b>	<p>The program has dedicated leadership and staff necessary to meet the scope of care, treatment, and services it provides across the continuum of care based on the organization's verified Maternal Level of Care.</p> <p>See MLCPM.02, EP 1</p> <p>The program has a designated leader who is accountable for the perinatal care program. This leader makes certain that the program does the following:</p> <ul style="list-style-type: none"> <li>Provides integrated, coordinated, patient-centered care that starts with prenatal care and continues through postpartum care</li> <li>Provides early identification of high-risk pregnancies and births and manages mothers' risks at a level that corresponds to the</li> </ul>	<p>The program has dedicated leadership and staff necessary to meet the scope of care, treatment, and services it provides across the continuum of care based on the organization's verified Maternal Level of Care.</p> <p>See MLCPM.02, EP 1</p> <p>The program has a designated leader who is accountable for the perinatal care program. This leader makes certain that the program does the following:</p> <ul style="list-style-type: none"> <li>Provides integrated, coordinated, patient-centered care that starts with prenatal care and continues through postpartum care</li> <li>Provides early identification of high-risk pregnancies and</li> </ul>	<p>The program has dedicated leadership and staff necessary to meet the scope of care, treatment, and services it provides across the continuum of care based on the organization's verified Maternal Level of Care.</p> <p>See MLCPM.02, EP 1</p> <p>The program has a designated leader who is accountable for the perinatal care program. This leader makes certain that the program does the following:</p> <ul style="list-style-type: none"> <li>Provides integrated, coordinated, patient-centered care that starts with prenatal care and continues through postpartum care</li> <li>Provides early identification of high-risk pregnancies and births and manages mothers' risks at a level that corresponds to the</li> </ul>	<p>The program has dedicated leadership and staff necessary to meet the scope of care, treatment, and services it provides across the continuum of care based on the organization's verified Maternal Level of Care.</p> <p>See MLCPM.02, EP 1</p> <p>The program has a designated leader who is accountable for the perinatal care program. This leader makes certain that the program does the following:</p> <ul style="list-style-type: none"> <li>Provides integrated, coordinated, patient-centered care that starts with prenatal care and continues through postpartum care</li> <li>Provides early identification of high-risk pregnancies and births and</li> </ul>	

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	<p>program's capabilities</p> <ul style="list-style-type: none"> <li>For identified or unanticipated high-risk pregnancies and births or maternal problems, the program provides direct care or stabilizes and safely transfers mothers who require care beyond the scope of services provided by the organization</li> <li>Maintains a written agreement for the transfer of or receiving of patients based on the organization's verified level of care</li> <li>Plans for continuity of health information include sharing ongoing information about the mother's health status with perinatal service providers and health care organizations involved in their care. This includes making sure that prenatal assessments and plans of care are accessible at locations where the mother is planning to deliver or receive</li> </ul>	<p>births and manages mothers' risks at a level that corresponds to the program's capabilities</p> <ul style="list-style-type: none"> <li>For identified or unanticipated high-risk pregnancies and births or maternal problems, the program provides direct care or stabilizes and safely transfers mothers who require care beyond the scope of services provided by the organization</li> <li>Maintains a written agreement for the transfer of or receiving of patients based on the organization's verified level of care</li> <li>Plans for continuity of health information include sharing ongoing information about the mother's health status with perinatal service</li> </ul>	<p>program's capabilities</p> <ul style="list-style-type: none"> <li>For identified or unanticipated high-risk pregnancies and births or maternal problems, the program provides direct care or stabilizes and safely transfers mothers who require care beyond the scope of services provided by the organization</li> <li>Maintains a written agreement for the transfer of or receiving of patients based on the organization's verified level of care</li> <li>Plans for continuity of health information include sharing ongoing information about the mother's health status with perinatal service providers and health care organizations involved in their care. This includes making sure that prenatal assessments and plans of care are accessible at locations where the</li> </ul>	<p>manages mothers' risks at a level that corresponds to the program's capabilities</p> <ul style="list-style-type: none"> <li>For identified or unanticipated high-risk pregnancies and births or maternal problems, the program provides direct care or stabilizes and safely transfers mothers who require care beyond the scope of services provided by the organization</li> <li>Maintains a written agreement for the transfer of or receiving of patients based on the organization's verified level of care</li> <li>Plans for continuity of health information include sharing ongoing information about the mother's health status with perinatal service providers and health care organizations involved in their</li> </ul>	
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	<p>care, and the providers' offices have access to the mother's postpartum information including transfer to a higher level of care</p> <ul style="list-style-type: none"> <li>Provides patient education and information about perinatal care services available to meet mothers' needs so that mothers can make informed decisions about their care</li> <li>Has ongoing quality improvement processes for making improvements to the program from prenatal to postpartum care</li> </ul>	<p>providers and health care organizations involved in their care. This includes making sure that prenatal assessments and plans of care are accessible at locations where the mother is planning to deliver or receive care, and the providers' offices have access to the mother's postpartum information including transfer to a higher level of care</p> <ul style="list-style-type: none"> <li>Provides patient education and information about perinatal care services available to meet mothers' needs so that mothers can make informed decisions about their care</li> <li>Has ongoing quality improvement processes for making improvements to the program from prenatal to postpartum care</li> </ul>	<p>mother is planning to deliver or receive care, and the providers' offices have access to the mother's postpartum information including transfer to a higher level of care</p> <ul style="list-style-type: none"> <li>Provides patient education and information about perinatal care services available to meet mothers' needs so that mothers can make informed decisions about their care</li> <li>Has ongoing quality improvement processes for making improvements to the program from prenatal to postpartum care</li> </ul> <p>a. The program has the capability to accept maternal transports from lower levels of care for unanticipated high-risk pregnancies</p>	<p>care. This includes making sure that prenatal assessments and plans of care are accessible at locations where the mother is planning to deliver or receive care, and the providers' offices have access to the mother's postpartum information including transfer to a higher level of care</p> <ul style="list-style-type: none"> <li>Provides patient education and information about perinatal care services available to meet mothers' needs so that mothers can make informed decisions about their care</li> <li>Has ongoing quality improvement processes for making improvements to the program from prenatal to postpartum care</li> </ul> <p>a. The program has the capability to accept maternal transports from lower levels of</p>	
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		prenatal to postpartum care		care for unanticipated high-risk pregnancies	
<b>Transfer Practices</b>	<p>The program identifies and manages mothers who should be transferred to another organization that provides higher-level care than the scope of the program's verified Maternal Levels of Care. The program and transfer organization establish effective communication before transfer, such as clear documentation and timely exchange of medical information, as well as providing followup information on the status of the mother after transfer.</p> <p>Management of mothers needing a higher level of care also includes the following:</p> <ul style="list-style-type: none"> <li>• Having an established relationship that provides for immediate consultation with and possible transfer to providers at an organization with a higher level of care (for example, maternal-fetal medicine subspecialists)</li> </ul>	<p>The program identifies and manages mothers who should be transferred to another organization that provides higher-level care than the scope of the program's verified Maternal Levels of Care. The program and transfer organization establish effective communication before transfer, such as clear documentation and timely exchange of medical information, as well as providing followup information on the status of the mother after transfer.</p> <p>Management of mothers needing a higher level of care also includes the following:</p> <ul style="list-style-type: none"> <li>• Having an established relationship that provides for immediate consultation with and possible transfer to providers at an</li> </ul>	<p>The program has the capability to accept maternal transports from lower levels of care for unanticipated high-risk pregnancies.</p> <p>See MLCPM.02, EP2</p>	<p>The program has the capability to accept maternal transports from lower levels of care for unanticipated high-risk pregnancies.</p> <p>See MLCPM.02, EP2</p>	

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	<ul style="list-style-type: none"> <li>• Being able to manage perinatal emergencies directly, by transfer, or by referral</li> <li>• Demonstrating an ongoing relationship with referral hospitals for immediate transfer</li> <li>• Providing timely assessment, stabilization, and treatment prior to transfer</li> <li>• Timely initiation of the transfer to the higher level of care</li> </ul> <p>See MLCDF.05, EP</p>	<p>organization with a higher level of care (for example, maternal-fetal medicine subspecialists)</p> <ul style="list-style-type: none"> <li>• Being able to manage perinatal emergencies directly, by transfer, or by referral</li> <li>• Demonstrating an ongoing relationship with referral hospitals for immediate transfer</li> <li>• Providing timely assessment, stabilization, and treatment prior to transfer</li> <li>• Timely initiation of the transfer to the higher level of care</li> </ul> <p>See MLCDF.05, EP</p>			
<b>Registered Nurse Staffing</b>	<p>Program leaders are responsible for selecting, orienting, educating, and training perinatal staff.</p> <p>The program leaders identify critical competencies and education for the program's team members.</p>	<p>Program leaders are responsible for selecting, orienting, educating, and training perinatal staff.</p> <p>The program leaders identify critical competencies and education for the</p>	<p>Program leaders are responsible for selecting, orienting, educating, and training perinatal staff.</p> <p>The program leaders identify critical competencies and education for the program's team members.</p>	<p>Program leaders are responsible for selecting, orienting, educating, and training perinatal staff.</p> <p>The program leaders identify critical competencies and education for the</p>	

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	MLCPM.06, EP4	<p>program's team members.</p> <p>MLCPM.06, EP4</p>	<p>Registered nurses receive special training and have experience in the management of women with complex and critical maternal illnesses and obstetric complications related to the population the program serves.</p> <p>MLCPM.06, EP4</p>	<p>program's team members.</p> <p>Registered nurses receive special training and have experience in the management of women with complex and critical maternal illnesses and obstetric complications related to the population the program serves. The perinatal program maintains a close collaboration between intensive care unit nurses and obstetric nurses with expertise in caring for critically ill women.</p> <p>MLCPM.06, EP4</p>	
<b>Interdisciplinary Team</b>	<p>The program has an interdisciplinary team that includes individuals with expertise in and/or knowledge about the program's specialized care, treatment, and services.</p> <p>The interdisciplinary team includes individuals and specialized services to support the care, treatment, and services provided by the program.</p>	<p>The program has an interdisciplinary team that includes individuals with expertise in and/or knowledge about the program's specialized care, treatment, and services.</p> <p>The interdisciplinary team includes individuals and specialized services to support the care, treatment, and</p>	<p>The program has an interdisciplinary team that includes individuals with expertise in and/or knowledge about the program's specialized care, treatment, and services.</p> <p>The interdisciplinary team includes individuals and specialized services to support the care, treatment, and services provided by the program.</p>	<p>The program has an interdisciplinary team that includes individuals with expertise in and/or knowledge about the program's specialized care, treatment, and services.</p> <p>The interdisciplinary team includes individuals and specialized services to support the care, treatment, and services</p>	

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	<p>The following individuals and specialized services are represented on the interdisciplinary team:</p> <ul style="list-style-type: none"> <li>• A qualified provider with obstetric privileges and appropriate training and expertise is readily available, per the organization's policy, at all times. (This includes midwives, obstetricians, and family practice physicians)</li> <li>• A qualified provider with anesthesia privileges is readily available, per the organization's policy, at all times.</li> <li>• Qualified personnel with privileges to perform a cesarean section are readily available at all times, per the organization's policy, for emergency cesarean deliveries.</li> <li>• Radiology support services are readily available, per the organization's policy, at all times.</li> <li>• A qualified medical staff member available to read</li> </ul>	<p>services provided by the program.</p> <p>The individuals and specialized services required for Maternal Level of Care I are represented on the interdisciplinary team, plus the following individuals:</p> <ul style="list-style-type: none"> <li>• An obstetric provider is readily available at all times, per the organization's policy.</li> <li>• A maternal-fetal medicine specialist is readily available at all times, per the organization's policy, for consultation on-site. Availability may be through phone or telemedicine, if necessary.</li> <li>• Internal medicine providers, family medicine providers, and general surgeons are readily available at all times, per the organization's</li> </ul>	<p>The individuals and specialized services required for Maternal Level of Care II are represented on the interdisciplinary team, plus the following individuals and specialized services:</p> <ul style="list-style-type: none"> <li>• A board-certified or board-eligible obstetrician is physically present on site at all times.</li> <li>• A maternal-fetal medicine specialist with inpatient privileges is readily available at all times, either on site, by phone, or by telemedicine, per the organization's policy. Timing of need to be on site is directed by urgency of clinical situation; however, the provider must be able to be on site to provide direct care within 24 hours.</li> <li>• A maternal-fetal medicine specialist is readily available at all times, per the organization's policy, for consult for every pregnant or</li> </ul>	<p>provided by the program.</p> <p>The individuals and specialized services required for Maternal Level of Care III are represented on the interdisciplinary team, plus the following specialized services:</p> <ul style="list-style-type: none"> <li>• A maternal-fetal medicine care team with expertise in managing highly complex, critically ill, or unstable maternal patients. This includes co-management for all pregnant or postpartum patients in the intensive care unit.</li> <li>• At least one of the following adult subspecialties are readily available at all times, per the organization's policy, for consultation and treatment needed on site: neurosurgery, cardiac surgery, or transplant surgery.</li> </ul> <p><b>Note:</b> If the organization does not have all three subspecialties</p>	
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	<p>ultrasounds is readily available, per the organization's policy.</p> <ul style="list-style-type: none"> <li>• Qualified labor, delivery, surgical, and recovery nursing personnel in adequate numbers to meet the needs of each patient are readily available, per the organization's policy, at all times.</li> <li>• Respiratory care personnel are readily available, per the organization's policy, at all times.</li> <li>• A registered pharmacist is readily available, per the organization's policy, at all times.</li> <li>• Laboratory services for immediately obtaining and processing appropriate samples and reporting urgent/ emergent laboratory requests are immediately available, per the organization's policy, at all times.</li> <li>• Blood bank services for determining ABO blood group and Rh type, crossmatching blood, and</li> </ul>	<p>policy, for obstetric patients.</p> <p>See MLCPM.07, EP1</p>	<p>postpartum patient in the intensive care unit.</p> <ul style="list-style-type: none"> <li>• Subspecialists are readily available, per the organization's policy, for inpatient consultation, which include critical care, general surgery, infectious disease, hematology, cardiology, nephrology, neurology, gastroenterology, internal medicine, behavioral health, and neonatology.</li> </ul> <p>See MLCPM.07, EP1</p>	<p><i>available, there should be a process in place to transfer women to an organization that can provide the needed services.</i></p> <p>See MLCPM.07, EP1</p>	
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	performing antibody testing are readily available, per the organization's policy, at all times.  See MLCPM.07, EP1				
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