



Michael D. Maves, MD, MBA, Executive Vice President, CEO

October 27, 2006

Robert A. Wise, MD
Vice President
Joint Commission on Accreditation
of Healthcare Organizations
One Renaissance Boulevard
Oakbrook Terrace, IL 60181

Dear Doctor Wise:

Once again, the American Medical Association (AMA) appreciates the opportunity to participate in the latest field review of the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) proposed revisions to Standard MS.1.20. Our detailed commentary on the proposed changes is provided in the enclosure.

The AMA received substantial input from our Organized Medical Staff Section (OMSS) in developing our response to the proposed revisions to MS.1.20. The OMSS is the only national group that advocates for medical staff organizations, and their input as advocates for medical staffs in this proposed revision of MS.1.20 has been invaluable.

The AMA maintains that key governance aspects which reaffirm and support medical staff self-governance need to be addressed in the medical staff bylaws rather than separate administrative manuals. In particular, medical staff organization, credentials, peer review, and fair hearing provisions must be incorporated into medical staff bylaws rather than supplemental documents, which can be changed by a small number of individuals on the medical staff or by administration and/or the governing body.

Our comments on the proposed revisions delineate our belief that all of the governance topics encompassed within Elements of Performance 8-27 must be addressed in the organized medical staff bylaws, and not in rules, regulations, policies and procedures. Movement of core organized medical staff principles into documents that lack the legal recognition of the bylaws as a binding contract would permit easy manipulation of the organized medical staff at the hands of a few individuals. This circumvention of the organized medical staff must not be permitted in order to ensure that the organized medical staff will be supported by strong, independent governance documents as its physicians pursue high quality patient care.

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Again, the AMA appreciates the opportunity to provide comment on Standard MS.1.20,
on behalf of our membership.

Sincerely,

Michael D. Maves, MD, MBA

Enclosure

cc: AMA Commissioners