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Organized Medical Staff Section

January 24, 2012

Mark Chassin, MD, FACP, MPP, MPH
President, The Joint Commission
One Renaissance Blvd.
Oakbrook Terrace, IL 60181

Dear Dr. Chassin:

On behalf of the American Medical Association Organized Medical Staff Section (AMA-OMSS), thank you for providing an opportunity to comment on proposed National Patient Safety Goal (NPSG) 16.01.01, which seeks to minimize the overuse of certain tests, treatments, and procedures to reduce the risk of patient harm. Identifying and addressing instances of overuse in the hospital setting is a vital patient safety concern and a key means for reducing health care costs, and we agree that this problem warrants the development of a new NPSG.

We are generally pleased with the approach outlined in the proposed standard and believe that its balance of guidance and freedom will allow organizations to effectively identify and address instances of overuse as best suits the needs of their specific patient populations. However, given that efforts to reduce inappropriate use are inextricably tied to clinical decision making and to the medical staff's accountability for the quality of patient care, we believe that medical staff leadership and involvement in this process should be explicitly required, even if such involvement is already a reasonably expected interpretation of the Goal as written.

We would therefore request that the final NPSG standard require organizations to include the medical staff in the processes of selecting a treatment, procedure, or test to be addressed, developing performance improvement tools and methods to reduce inappropriate use, evaluating the success of these tools and methods, and taking action when planned improvements are not achieved or sustained.

Thank you for your consideration in this matter. We look forward to continued interaction between the AMA-OMSS and The Joint Commission as the NPSG development process moves forward.

Sincerely,

Jay Gregory, MD
Chair, AMA Organized Medical Staff Section

- cc: Ana Pujols-McKee, MD
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