



UPDATE: Summary of March Changes from CMS Hospital Deeming Application

The Joint Commission held an audio conference on March 26 to provide accredited hospitals with information on changes to standards and elements of performance (EPs) resulting from continued discussion with the Centers for Medicare & Medicaid Services (CMS). As a follow-up to that call, this article summarizes the changes for 2009 and provides a list of the standard numbers and EPs affected by the Joint Commission's deeming application (see the box on page 15).

Here are some facts to be aware of:

- There are **no new requirements** between the January and March CMS updates.
- A significant number of the January requirements were considered equivalent to existing EPs or were already addressed in The Joint Commission survey process and were **deleted for March**.
- A few of the current requirements **do contain Medicare-specific language** from the January version that CMS recommended retaining to meet the level of specificity in the Conditions of Participation (COPs) (please see "The Fact on Fiction" article on page 13 of this issue).
 - The "Revised 2009 Accreditation Requirements as of March 26, 2009—Hospital Accreditation Program" document available on the Joint Commission Web site now **includes scoring and criticality** for all of the requirements, as well as documentation and Measure of Success (MOS) designations.
 - Some organizations are **not subject to the COPs** and may not be subject to

Support materials for accredited hospitals will be updated by July 1, 2009

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some of the new and revised EPs (for example, the restraint and seclusion standards for deemed hospitals only).

Support materials for accredited hospitals will be **updated by July 1, 2009**, to contain the CMS-inspired changes (this was, unfortunately, miscommunicated at the conference call).

This includes the following resources:

- The automated Periodic Performance Review (PPR) available through *The Joint Commission Connect*[™]
- Update 1 to the *2009 Comprehensive Accreditation Manual for Hospitals*
- E-dition
- Accreditation Manager Plus (AMP)

Clarifying R&S Changes

If a hospital is using accreditation for deemed status, Standards PC.03.05.01 through PC.03.05.19 will *replace* PC.03.02.01 through PC.03.03.31. If the hospital is *not* using accreditation for deemed status, the current Standards PC.03.02.01 through PC.03.03.01 apply to restraint and seclusion.

The complexity and nature of safe patient care involving the use of restraint and seclusion are key issues for the Joint Commission, which will continue to evaluate these standards in

the coming months. Over the next year or so, The Joint Commission will review the current requirements at PC.03.02.01 through PC.03.03.31 to determine if any of the requirements will be revised and included in the deemed status requirements at PC.03.05.01 through PC.03.05.19.

Identifying Specific Changes

The four major areas of change in terms of requirements that align Joint Commission standards more effectively with the COPs include the following:

1. Restraint and seclusion, which resulted in removing the 2008 Joint Commission standards (that separated behavioral- versus medical-based treatment) and replacing them with CMS behavioral-based decision making requirements (PC.03.05.01 through PC.03.05.19)
2. History and physical (MS.01.01.01, EP 20; PC.01.02.03, EPs 4 and 5; RC.01.01.01, EP 4)
3. Preanesthesia and postanesthesia evaluations (PC.03.01.03, EP 18; PC.03.01.07, EPs 7 and 8)
4. Blood transfusions (PC.02.01.01, EP 15)

Robert Wise, M.D., vice president of the Joint Commission's standards division, assured the listeners to the conference call, "If you have been meeting The Joint Commission standards in the past, with few exceptions you'll be

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meeting the new revisions.” Those exceptions refer to the four categories listed above. In most cases, Joint Commission standards already covered these topics, just not in the specificity now required by CMS.

You can listen to the March 26 call, read the transcript, or find the updated standards documents on the Joint

Commission Web site at <http://www.jointcommission.org/AccreditationPrograms/Hospitals>. The Joint Commission will continue to work with CMS in the coming months through the deeming application process and remains confident that it will receive deeming authority. 

CMS-Related Changes Scheduled for Implementation April 6, 2009*

From the “Human Resources” (HR) Chapter

1. HR.01.02.01, EP 19
2. HR.01.04.01, EP 3

From the “Leadership” (LD) Chapter

3. LD.01.05.01, EP 7
4. LD.04.01.05, EP 7
5. LD.04.03.01, EPs 2 and 26
6. LD.04.03.09, EP 10

From the “Life Safety” (LS) Chapter

7. LS.01.01.01, EP 4

From the “Medication Management” (MM) Chapter

8. MM.01.01.03, EP 5
9. MM.03.01.01, EPs 3 and 19
10. MM.05.01.07, EPs 5 and 6
11. MM.07.01.03, EP 6

From the “Medical Staff” (MS) Chapter

12. MS.01.01.01, EPs 20 and 21
13. MS.02.01.01, EP 4
14. MS.03.01.01, EPs 13 and 14
15. MS.03.01.03, EPs 3 and 12
16. MS.05.01.01, EP 17
17. MS.06.01.03, EP 9

From the “Nursing” (NR) Chapter

18. NR.02.03.01, EPs 4 and 7

From the “Provision of Care, Treatment, and Services” (PC) Chapter

19. PC.01.02.03, EPs 4 and 5
20. PC.02.01.01, EP 15

21. PC.02.01.03, EPs 1, 7, and 14
22. PC.03.01.03, EP 18
23. PC.03.01.07, EPs 7 and 8
24. PC.03.01.08, EPs 1, 2, and 3
25. PC.03.05.01, EPs 1, 2, 3, 4, and 5
26. PC.03.05.03, EPs 1 and 2
27. PC.03.05.05, EPs 1, 2, 3, 4, 5, and 6
28. PC.03.05.07, EP 1
29. PC.03.05.09, EPs 1 and 2
30. PC.03.05.11, EPs 1, 2, and 3
31. PC.03.05.13, EP 1
32. PC.03.05.15, EP 1
33. PC.03.05.17, EPs 2, 3, 4, and 5
34. PC.03.05.19, EPs 1 and 2
35. PC.04.01.01, EPs 22, 23, 24, 25, and 26
36. PC.04.01.03, EPs 10 and 11
37. PC.04.01.05, EPs 1, 2, and 7
38. PC.05.01.09, EPs 1 and 2

From the “Record of Care, Treatment, and Services” (RC) Chapter

39. RC.01.01.01, EP 19
40. RC.01.03.01, EP 4
41. RC.02.01.01, EP 2
42. RC.02.01.03, EP 15
43. RC.02.03.07, EPs 4 and 6
44. RC.02.04.01, EP 3

From the “Rights and Responsibilities of the Individual” (RI) Chapter

45. RI.01.05.01, EP 21
46. RI.01.07.01, EP 6, 19, and 20

* Beginning July 1, 2009, non-compliance with the revised requirements will impact the accreditation decision.