

April 13, 2010

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

Dear Dr. Chassin:

The undersigned medical associations, representing over 600,000 physicians and other members, urge The Joint Commission to modify its revised glossary definition of “physician” so as to avoid unintended consequences and likely confusion among hospitals, administrators and, most importantly, the patients we serve. We understand that the revision was intended to align The Joint Commission’s definition of terms with the Centers for Medicare and Medicaid Services (CMS) (*See* §1861 [42 U.S.C. 1395x] of the Social Security Act); however, it is important to recognize that this definition primarily corresponds to payment rather than any scope of practice, licensure, accreditation or other purpose that might fall in the purview of The Joint Commission.

We strongly believe the term “physician” is a descriptor that should be limited to individuals who have received a Doctor of Medicine or a Doctor of Osteopathic Medicine degree, or an equivalent degree of medicine following successful completion of a prescribed course of study from an international school of medicine.

All of the undersigned organizations believe in providing the highest quality and safe care for our patients. We also believe in the fundamental principle of truth and transparency with regard to physician and non-physician providers. There is a movement among many healthcare providers to refer to themselves as “doctor.” In a healthcare environment, our patients understand the terms “doctor” and “physician” to be synonymous. We owe them every effort to recognize this perception and to minimize, not increase, misleading nomenclature.

Drawing distinctions in The Joint Commission Elements of Performance (EPs) between tasks whose responsibility reside with “a doctor of medicine or osteopathy” and those whose responsibility reside with a “physician” is confusing for administrators, practitioners and patients. In a time when patients are encouraged to take a more active role in their health care decisions and are responsible for digesting substantial amounts of information in this regard, the revision to The Joint Commission definition of “physician” further hamstrings patients as it blurs the distinction. This additional confusion amongst our patients as they attempt to make important health care decisions is an issue of truth and transparency. In the interest of ensuring patients, administrators and all health care practitioners clearly understanding the differences between the training, education and skills of physicians and non-physicians, we believe that it is a disservice to employ such a broad definition of physician.

As such, we, along with the American Medical Association and the organizations that joined their letter, recommend that The Joint Commission rescind its July 1, 2009, revision and amend the glossary as follows:

***Physician** – an individual who has successfully completed a prescribed course of study from a school of allopathic medicine accredited by the Liaison Committee of Medical Education (LCME) or a school of osteopathic medicine accredited by the American Osteopathic Association (AOA) and has received a Doctor of Medicine (MD degree), a Doctor of Osteopathic Medicine (DO degree), or an equivalent medical degree (e.g., MBBS) from an international medical school.*

In your mission statement, The Joint Commission explicitly states that it will perform its functions “in collaboration with stakeholders.” Since we do not believe that physicians, a primary stakeholder in this issue, were properly consulted, this letter hopefully provides some perspective. We trust that you will make this revision to ensure appropriate safeguards to patients in regard to truth and transparency concerns and to minimize confusion and future consequences of blurring the lines between physicians and other health care practitioners.

Sincerely,

American Academy of Family Physicians
American Academy of Ophthalmology
American Academy of Otolaryngology-Head and Neck Surgery
American Association of Neurological Surgeons/ Congress of Neurological Surgeons
American Association of Orthopaedic Surgeons
American College of Cardiology
American College of Emergency Physicians
American College of Surgeons
American Osteopathic Association
American Society for Dermatologic Surgery Association
American Society of Anesthesiologists
American Society of Plastic Surgeons
American Society for Reproductive Medicine
Arizona Medical Association
Arkansas Medical Society
California Medical Association
Carolinas Chapter/American Association of Clinical Endocrinologists
Colorado Academy of Family Physicians
Colorado Medical Society
Colorado Section of the American Congress of Obstetricians and Gynecologists
Colorado Society of Eye Physicians and Surgeons
Connecticut State Medical Society
Florida Medical Association
Hawaii Medical Association
Idaho Medical Association

Illinois State Medical Society
Indiana State Medical Association
Kansas Medical Society
Kentucky Medical Association
MedChi, The Maryland State Medical Society
Medical Association of Georgia
Medical Association of the State of Alabama
Medical Society of Delaware
Medical Society of New Jersey
Medical Society of Virginia
Medical Society of the District of Columbia
Medical Society of the State of New York
Massachusetts Medical Society
Michigan State Medical Society
Missouri State Medical Association
Nebraska Medical Association
Nevada State Medical Association
New Hampshire Medical Society
New Mexico Medical Society
North Carolina Dermatology Association
North Carolina Neurological Society
North Carolina Obstetrical & Gynecological Society
North Carolina Orthopaedic Association
North Carolina Society of Eye Physicians and Surgeons
North Carolina Society of Otolaryngology – Head & Neck Surgery
North Carolina Society of Pathologists
North Carolina Spine Society
North Dakota Medical Association
Ohio State Medical Association
Oklahoma State Medical Association
Oregon Medical Association
Pennsylvania Medical Society
Rhode Island Medical Society
South Carolina Medical Association
Tennessee Medical Association
Utah Medical Association
Vermont Medical Society
West Virginia State Medical Association
Washington State Medical Association
Wisconsin Medical Society
Wyoming Medical Society