

April 14, 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 Facial Plastic and Reconstructive Surgery  
American Academy of Family Physicians  
American Academy of Ophthalmology  
American Academy of Otolaryngology-Head and Neck Surgery  
American Academy of Pediatrics  
American Academy of Physical Medicine and Rehabilitation  
American Association 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  
College of American Pathologists  
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