



American Hospital
Association

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July 27, 2009

Charlene Frizzera
Acting Administrator
Centers for Medicare & Medicaid Services
Hubert H. Humphrey Building
200 Independence Avenue, S.W., Room 445-G
Washington, DC 20201

RE: Application by The Joint Commission for Continued Deeming Authority for Hospitals

Dear Ms. Frizzera:

On behalf of our more than 5,000 member hospitals, health systems and other health care organizations, and our 38,000 individual members, the American Hospital Association (AHA) strongly supports The Joint Commission's application for continued deeming authority for the accreditation of hospitals that wish to participate in the Medicare or Medicaid programs. Currently, The Joint Commission is the nation's largest health care accrediting organization, accrediting approximately 88 percent of the country's hospitals.

The Joint Commission's set of accreditation standards go beyond the minimum requirements of the Medicare Conditions of Participation (CoPs) and focus on key functional areas within a hospital, such as patient rights, patient care and infection control. The standards examine not only an organization's ability to provide safe, high quality care, but also its actual performance. The Joint Commission standards set forth performance expectations for activities that affect the safety and quality of patient care. If a hospital does the right things and does them well, there is a strong likelihood that its patients will experience good outcomes. The Joint Commission develops its standards in consultation with health care experts, providers, purchasers and consumers and continually updates the standards as science and preferred practices evolve. Therefore, **we urge the Centers for Medicare & Medicaid (CMS) to approve The Joint Commission's application for continued deeming authority for hospitals.**



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We appreciate the opportunity to comment on The Joint Commission's application for continued deeming authority for hospitals. If you have any questions, please contact me or Nancy Foster, vice president of quality and patient safety policy, at (202) 626-2337 or nfoster@aha.org.

Sincerely,

Rick Pollack
Executive Vice President