May 1, 2019

Mark Chassin, M.D.
President and CEO
The Joint Commission
One Renaissance Blvd
Oakbrook Terrace, Ill 60181

Dear Dr. Chassin:

On behalf of the American Hospital Association’s (AHA) nearly 5,000 member hospitals, health systems and other health care organizations, including more than 2,000 hospitals and health systems that have labor and delivery units, we appreciate the opportunity to comment on the Joint Commission’s recently proposed standards for perinatal safety. These standards play a vital role for pregnant and postpartum women, as well as their families. We appreciate the Joint Commission’s proposed standards and support their implementation to ensure that health care providers are in the best position to provide the highest quality of care to our patients.

Maternal hemorrhage risk and severe hypertension/preeclampsia are two of the most common complications that occur in pregnant and postpartum women. Ensuring that hospitals and providers are trained and prepared to diagnose, manage and effectively treat such complications is critical. In addition to the work each hospital has done and continues to do to address these issues, we commend the Joint Commission for its efforts to reduce negative outcomes when complications do arise. Specifically, we support the Joint Commission’s focus on evidence-based procedures and responses that will ensure the most medically appropriate and effective course of treatment for those individuals diagnosed with either maternal hemorrhages or severe hypertension/preeclampsia. In addition, we support the proposed requirement for education of staff, and believe conducting complication-specific training and drills will better prepare providers to act effectively and efficiently when these situations arise. Further, we support the proposed provisions to provide patients and their families with the necessary educational materials to recognize symptoms that require immediate care as another important safeguard in this process.

As the AHA and its members continue to address maternal mortality, the Joint Commission is a vital partner in those efforts. We look forward to continuing to work with your organization as you establish and implement the proposed standards, as well as
others that address perinatal safety. Please do not hesitate to contact me if you have any questions, or feel free to have a member of your team contact Mark Howell, senior associate director of policy, at mhowell@aha.org or 202-626-2317.

Sincerely,

/s/

Thomas P. Nickels
Executive Vice President