Revisions to Outpatient Record Review Requirements for Critical Access Hospitals

The Joint Commission recently revised a Medical Staff (MS) requirement for critical access hospitals based on the Centers for Medicare & Medicaid Services’ (CMS) January 16, 2015, revisions to its interpretive guidelines related to the review of outpatient records (S&C: 15-19-CAH).* Effective July 1, 2015, Standard MS.03.01.03, element of performance (EP) 11 has been revised to clarify that a sample of outpatient records must be reviewed when required by state law. The Note at EP 11 was also revised to delete the 25% sample requirement and to clarify that each critical access hospital determines by its own policy the size of the sample reviewed.

These revisions are in addition to those made last year to the same EP as a result of CMS’s revisions to Conditions of Participation for critical access hospitals published in the May 12, 2014, Federal Register (see the September 2014 Perspectives, page 10). Those changes were part of CMS’s efforts to remove unnecessary, obsolete, or excessively burdensome requirements.

The revised requirement, which is displayed on The Joint Commission website at http://www.jointcommission.org/standards_information/prepublication_standards.aspx, will be posted in the fall E-dition® and published in the 2016 Comprehensive Accreditation Manual for Critical Access Hospitals (CAMCAH). The box below displays the revised requirement.

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**Official Publication of Joint Commission Requirements**

**Revision to Standard MS.03.01.03, EP 11**

**Applicable to Critical Access Hospitals**

**Effective July 1, 2015**

**Medical Staff (MS)**

**Standard MS.03.01.03**

The management and coordination of each patient’s care, treatment, and services is the responsibility of a practitioner with appropriate privileges.

**Element of Performance for MS.03.01.03**

A 11. When state law requires outpatient record reviews, or co-signatures, or both, by a collaborating physician, a doctor of medicine or osteopathy periodically reviews and signs the a sample of outpatient records of patients cared for by nurse practitioners, clinical nurse specialists, certified nurse midwives, or physician assistants. R

**Note:** When state law allows a sample of outpatient records to be reviewed for the aforementioned practitioners, a review of at least 25% of outpatient records must be performed requires review of such outpatient records, the critical access hospital determines by policy the size of the sample reviewed and signed.