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Technical Director, Hospital Survey and Certification
Centers for Medicare and Medicaid Services
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September 2, 2015

Dear Captain Eddinger,

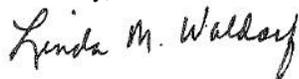
The National Association Medical Staff Services (NAMSS) would like to comment on recent remarks made by CMS implying that the hospital governing body is the only body authorized to grant temporary privileges to practitioners. We are concerned that this recent publicized interpretation is not standard practice and is in direct conflict to the standards put forth by The Joint Commission (TJC), Healthcare Facilities Accreditation Program (HFAP), and other CMS-approved accrediting bodies that have long been viewed as being compliant with CMS' Conditions of Participation (CoP). NAMSS members have voiced strong trepidation that this recent interpretation will negatively affect the delivery of healthcare in hospitals across the nation. NAMSS urges CMS to reconsider its recent interpretation and position on this issue and allow the current national practice and process of granting temporary privileges to continue in order to ensure that healthcare entities are able to provide timely patient care when the need arises.

In accordance with the standards established by the various accrediting agencies, temporary privileges are primarily designed to address an "immediate patient care need" as well as to address the onboarding process of practitioners, particularly in the situation where hospital governing boards do not meet on a monthly basis. Any change in the CoP or how they are interpreted could hinder the ability of hospitals to allow providers to provide necessary patient care while awaiting full review and approval by the hospital's governing body.

The current practice of granting temporary privileges, as exemplified in TJC standard MS.06.01.13, allows the hospital CEO or his/her authorized designee, upon the verification of certain required credentialing elements, to grant temporary privileges based on the recommendation of the president of the medical staff or his/her authorized designee. This represented a sound practice and process that allows, under appropriate circumstances, patients to receive the care they need in a timely fashion. CMS's CoP (42 CFR § 482.12 and 42 CFR § 482.22) do not specifically address granting temporary privileges or the delegation of authority from the hospital governing body to the CEO in granting temporary privileges. NAMSS supports and encourages CMS to allow the industry standard practice to proceed and strongly objects to any change to the current temporary privileging practice through CMS' interpretation of the CoP in what is a recognized and safe process for appropriately granting temporary privileges to a practitioner.

Thank you for your consideration in this important matter. NAMSS looks forward to working with CMS to resolve this matter in a way that preserves current practice and patient access to timely care. If you have any questions or need additional information, please contact John Richardson, NAMSS Director of Government Relations, at 202-367-1239 or at jrichardson@namss.org.

Sincerely,



Linda Waldorf, CPMSM, CPCS
President, National Association Medical Staff Services



John Richardson
Director, Government Relations, National Association
Medical Staff Services