

What does the JCAHO expect for H&P?

What does the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) require regarding an update to the patient's history and physical (H&P) before surgery? It is an area that has caused confusion.

JCAHO revised its requirement in 2004. The current requirement in the Provision of Care chapter is that an H&P must have been completed within 30 days before the patient was admitted or readmitted to the hospital. In addition, "updates to the patient's condition since the assessment(s) are recorded at the time of admission" (PC.2.120). For outpatient surgery, the update is needed at time of arrival.

Regarding surgery, a medical records standard in the Management of Information chapter (IM.6.30) says the H&P plus any diagnostic tests and a diagnosis "are recorded before the operative or other procedure."

"Essentially, we're now requiring an update 100% of the time," John Herringer, associate director of standards interpretation for JCAHO, told *OR Manager* in an interview.

How extensive does the update need to be?

"The update could range from writing 'no changes' to having to document a significant amount of detailed information about the patient's condition that has changed," Herringer says. "It would all depend on what the re-evaluation of the patient reveals. It needs to accurately reflect the findings: either that there are no changes or a detailed description of all the changes."

Previously, an update was needed only if there were significant changes in the patient's status or if the H&P was done 8 to 30 days prior to admission or outpatient surgery. (The latter was to comply with a Medicare requirement from the Centers for Medicare and Medicaid Services, or CMS.)

JCAHO's requirements for the update now exceed those of CMS, Herringer noted.

CMS says there must be a complete H&P in every patient's chart prior to surgery, except in emergencies. The H&P must be performed within 30 days before admission. In addition, CMS says there must be an assessment to update the patient's status within 7 days before surgery. There must be an update note, regardless of whether there has been a change in status. This language appears in section 482.51(b)(1) of the CMS State Operations Manual, which outlines guidelines for state surveyors.

Because JCAHO now mandates an update for all patients, "our requirements now go beyond those of CMS," Herringer says.

"For years, people have been confusing the CMS requirements with Joint Commission requirements," he adds. Some believed the 7-day update requirement came from JCAHO when it actually came from CMS.

Now that JCAHO requires an update for every patient, that provision also covers the CMS requirement. ♦

JCAHO has an interpretation of the H&P requirements at www.jcaho.org. Look under Accredited organizations, then Hospital, then Standards, then FAQ-Hospitals. The FAQ is dated Dec 3, 2004.

Update on JCAHO H&P standard

Several readers let us know that the information in the January issue on the Joint Commission's H&P requirements was out of date. In this article, the Joint Commission provides the latest information.